ALASKA

March 13, 1967

Comments on FCC Docket No. 14185 in the Matter of Revision of the FM Broadcast Rules, Particularly as to Allocation and Technical Standards (Educational FM Channels).

Submitted by: University of Alaska, College, Alaska

In the matter of a table of allocation for educational FM assignments, the University of Alaska agrees that such a table will better serve the public interest. Since, however, channels 201 through 220 are not available for educational broadcasting in Alaska, some reasonable alternative table for educational assignments in Alaska should be made.

The criterion relating number of assignments to community population suggested in the Commission's Notice of Inquiry released on November 14, 1966 will be adequate and desirable for Alaska.

The size of Alaska communities in relation to the large sparsely populated areas aurrounding them indicate that the Commission should consider several class C educational assignments in the commercial band for Alaska.

The Commission's proposals for more effective use of the spectrum through up-grading or elimination of 10 watt assignments is sound and commendable. The University of Alaska supports proposals (1); (2); and (3) of paragraph 5 of the November 14 Notice.

Signed:

Wm R. Wood

William R. Wood
President,
University of Alaska

WRW/rvh
cc: National Educational Radio

ARIZONA

Phoenix College

MARICOPA COUNTY JUNIOR COLLEGE DISTRICT

ROBERT J. HANNELLY, PH.D.
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VICE PRESIDENT

ROBERT A. TAYLOR
BUSINESS MANAGER

1202 WEST THOMAS ROAD • PHOENIX, ARIZONA 85013

Mr. Jerrold Sandler
National Educational Radio
1346 Connecticut Avenue N.W.
Washington, D.C. 20036

Dear Mr. Sadler:

Attached are my comments to the FCC on the Non-Commercial Educational Radio question. I do not know if you or your organization will agree or not, but having observed a number of educational radio stations throughout the country something must be done.

We would be interested in obtaining some of your network programs but cannot obtain a listing of them for any of our normal sources. If you can be of any help it would be appreciated.

Sincerely,

Charles E. Buzzard
Professor of Radio and TV

December 12, 1966

Mr. Ben F. Waple, Secretary
Federal Communications Commission
Washington, D. C. 20554

Dear Sir:

Attached are copies of comments which we would like to file in the matter of FCC Docket No. 14185, File B-FCC 66-1007, 90260 - Revision of FM Broadcast Rules; Particularly as to Allocation and Technical Standards (Educational FM Channels).

Thank you very much.

Sincerely,

C. E. Buzzard
Instructor of Radio

CEB:sk

Docket #14185
File B-FCC-66-1007 90260
Revision of FM Broadcast Rules

The following comments are submitted by Mr. Charles E. Buzzard, Professor of Radio and T.V. at Phoenix College, Phoenix, Arizona, 85013. Mr. Buzzard's background is as follows:

Education: BA in Speech, State University of Iowa
MA in Telecommunications, University of Southern California
MED in Higher Education
MS in Instructional Technology

Mr. Buzzard was instrumental in the building of WMCO-FM, Muskingum College, New Concord, Ohio: KTXT-FM, Texas Technological College, Lubbock, Texas; and the revitalizing of KFCA-FM, Phoenix College, Phoenix, Arizona. Mr. Buzzard is a member of the Society of Motion Picture and Television Engineers, the Audio Engineers, International Platform Association, the Speech Association of America, the Association for Professional Broadcast Education, and many other organizations in the field of broadcasting and education. Mr. Buzzard was associated at one time with NBC in Hollywood.

It is felt that the pending rule change affecting the operation of 10 watt non-commercial educational FM stations has both advantages and disadvantages.

First, it is agreed that the operation of a 10 watt station, the 50 MVU contour of which is approximately 2 miles in radius, is not necessarily good use of the radio spectrum. In many cases, this type of station is operated with the basic purpose of serving a limited area and to serve more would be a waste of power. Examples of this are the many 10 watt stations in the Southern California metropolitan area. Currently, several would have to go off the air if the power requirements were increased. We are sure that the same conditions exist along the east coast.

The 10 watt station also serves as the basic replacement of the carrier current AM radio service that has been used by many colleges. With the great building boom of new housing facilities and dormatories on many campuses, it has become impractical to continue carrier current AM operation, and a 10 watt FM station has resulted. One of the inherent problems of a low-powered AM carrier current station is keeping the power low enough to be within the legal limits as required by the FCC rules and regulations.

Since many educational institutions seem to condone the start and the operation by students of a 10 watt station, involving little or no supervision from the faculty or the college administration, the programming broadcast over these facilities is not necessarily well regulated. Popular music in some cases rock and roll full time, constitutes the programing. The FCC should require the educational institution to indicate in the license review forms to show the type of supervision that is exercised over the operation of the facility or school administration.

In the areas where there is a major population center, with a great distance to the next population center, the 10 watt station does not necessarily perform the best function for fostering good non-commercial service to the communities. In cities with a population of over 100,000, the 10 watt station will not usually provide adequate coverage of the community, as it is normally not located in the geographical center. Therefore, to provide coverage that has a signal strength sufficient to be received by a short indoor antenna, more power is needed.

The feeling in most major metropolitan areas is that the 10 watt station is not adequate to serve the community. But, since this type of station is the easiest to get started, the FCC does not do away with this type of station entirely. Instead it requires the licensee of such a station to increase his minimum power or submit a statement showing good cause as to why this could

not be done. All of the basic technical standards applying to a commercial FM station would also be applied to this type of a non-commercial station except for the number of hours of operation. The number of hours of operation would be a minimum of 10 hours of operation. The number of hours of operation would be a minimum of 10 hours per week and this would be reviewed at the license renewal times where competing applications were on file for the same frequency. The technical requirement requiring a person holding a Radio-Telephone First-Class Engineering license to be on the station staff or under contract, so that he checks the equipment daily, should be modified to require that he do only maintenance work on the transmitter and check the operating condition of the equipment monthly, or at other times when it is believed to be operating abnormally.

Many colleges and schools have licenses for 10 watt stations but do not use the facility except for an occasional period during the year. It would seem that at the normal license review time, the FCC should require the station to be operated sufficient hours during a year to be of service to the community. This requirement could be an easy one for most operators to meet possibly 10 hours per week that the college or school is operating during the normal school year.

It is felt that the assignment of specific FM channels to communities would not necessarily be detrimental except where the educational institutions are near a major metropolitan market. In these cases, with the licensee showing just cause as to the need of additional channel allocation, additional channels could be allocated. Example: a community of 10,000 population, which is a suburban community. and has three colleges, could request additional frequencies to have one for each college and possibly one for the public school.

In many current cases, the support for station's operations and new equipment is inadequate for anything except the smallest and most limited 10

watt operation. This is indicated by the many schools which operate commercial AM carrier current stations and support their non-commercial FM stations with them. One way to remedy this would be to allow these stations, which increase their power, the opportunity to receive payment for time on the basis that spot commercials could not be accepted, but programs of one half or one hour could be purchased by an advertiser with the maximum of 2:20 minutes of non-program time per half hour. This would provide a limited amount of revenue for the operation and for maintenance of these stations and provide funds for bringing better programming to their audiences, or allow colleges and schools to operate 100 watt AM non-directional daytime-only stations for the support of the FM non-commercial stations.

In view of the above background, it would be recommended that all 10 watt stations be deleted within a period of the next two normal license periods, unless the licensee should prove that his 10 watt service is necessary to his community and that increasing the power would be harmful to other existing stations in the area. and that the FCC modify some of its current rules and regulations to take into consideration the aforementioned changes. These proposed changes, and possibly others, would vastly increase the stature and the service of educational radio in the United States during the next decade.

Specific recommendation based on the above are as follows:

1. Application for 340 and Section 73.311 be modified as to the prediction of coverage curves except for the 50 UV/M contours: also of field strength contours to require only the 50 UV/M contour.

2. Section 73.261 be modified to read "for non-commercial education stations a minimum of 10 hours per week consisting of not less than 2 hours in any one day. except Saturday and Sunday, during the normal college academic year. A non-commercial station may cease operations during the academic year for normal

vacation periods if the FCC and District engineer are notified of the periods at least 10 days prior to the time the station will be off the air."

3. Section 73.265(e) should be modified as to not require "a complete inspection of all transmitting equipment by an operator holding a valid radio-telephone first class operator's license at least a month each month of operation for non-commercial stations operating with transmitter of 1 KW power output or less."

KSDA 89.7 mc

for selective listeners

California

11735 CAMPUS DRIVE
RIVERSIDE, CALIFORNIA 92505

Phone 689-4321, Ext. 256

December 20, 1966

For your information

Federal Communications Commission
Washington, D. C. 20554

Gentlemen:

This is a reply to the notice of inquiry issued by the FCC recently (Docket No. 14185) regarding the FM channels set aside for use by non-commercial educational stations. The plan is to assign a number of channels for each locality based strictly on a population basis and to eliminate gradually the 10-watt FM stations in preference to the stations operating with higher power. In theory, perhaps, the 10-watt stations are not utilizing the frequencies to best advantage. However, there are other things to consider other than what may appear to be theoretically advantageous.

First of all, the table of assignments does not give much flexibility. For example, the local area where KSDA is located has a population of approximately 300,000 in the combined Riverside/San Bernardino areas. We have five non-commercial educational FM stations on the air. Now according to the table of the allocation plans there will be four assignments made to an area this size. This means that in the local area there is one more station on the air than what would be allowed going by the new allocation plans. There should definitely be more flexibility allowed in the table of assignments because in certain areas there are more schools than in others. And there should be more opportunity for these schools to operate their own stations.

We believe that the answer to the problem comes with the fact that the FCC should consider assigning channels for non-commercial educational use from channels 204 through 220, and save the bottom three channels for use by 10-watt stations, and move all of the current 10-watt to these channels. Most 10-watt stations already operate on these channels. And therefore a move to these frequencies would not affect very many stations. Then the higher frequencies would be available for assignment, for use by higher powered stations.

The use of channels 201 through 203 by the 10-watt stations would give the added flexibility needed to allow other schools to operate their own radio station and in addition would minimize interference to television channel 6 by keeping the station's power on frequencies next to the channel limited to 10-watts transmitter output. This would greatly reduce the amount of interference on channel 6 and would allow sufficient band width in most areas to

allow the current 10-watt stations to move to these frequencies without appreciable interference. It would also give room in many areas for new stations to be built on these frequencies when the assigned channels had become occupied.

When approximately fifty percent of the non-commercial educational FM stations in the United States are in the 10-watt category it is hard to believe that this type of station should be eliminated. The contribution of the 10-watt FM station to the field of educational broadcasting is much greater than the ineffieiency factor caused by the use of a number of stations operating with low power.

There are several reasons why 10-watt stations should be allowed to continue to operate. The first reason is the cost factor. Many colleges are not able to build large FM stations to begin with. However, they do want to get on the air. A low power 10-watt station allows them to get on the air for a minimum amount of expense. After the value of the radio station is proved, and personnel have experience in operating the station, many times these stations then go up to higher power and are able to serve a larger area. So the 10-watt station actually proves its value in the fact that it becomes a stepping-stone to greater service by the school which is running the station, in that later on chances are it will increase to higher power and serve a larger area.

There is an incentive to start with low power when small funds are available. For example, KSDA is cooperating in a tape exchange network with five other college operated FM stations. Of these stations four started out as 10-watt stations. And of the four that started out as 10-watt stations three of them have either increased their power or currently have construction permits to do so. We wonder how many of these stations would be operating at all if they had not first started out as low-power stations and later increased and expanded their facilities as funds became available.

Second, in some areas, 10 watts is the most economical power with which to operate. For instance, in small communities centered around the school higher power is not needed nor is ti economical.

A third reason is that to begin with in certain cases the engineering personnel may not be available for a larger operation. Since daily transmitter checks are not required with a 10-watt station, and certain other engineering procedures are not required, an engineer can properly maintain a small station while getting more experience, and the college can in time train more personnel for their first or second class license. After personnel are properly trained, then they would be capable of operating the station at higher power and the personnel would be available to make the daily transmitter checks and perform proper maintenance of the equipment.

In the ultra-high frequency television table of assignments we find the upper UHF channels not allocated, but these are left free for assignment to small communities for their local television station to be operated at low power with a limited service in mind. The 10-watt FM stations can serve the same purpose for the radio audience and can be utilized in communities which otherwise do not have assignments or where an additional channel is needed.

We suggest that regardless of what plan is adopted for the educational FM band that the currently operating 10-watt stations be allowed to continue on the air with no time limit to their operation. If a plan is not adopted to set aside channels 201, 202, and 203, for non-commercial educational use by 10-watt stations then we believe that the table of assignments should be made up with the existing 10-watt station in mind, and they should be allowed to operate indefinitely subject to other license requirements.

Apparently there is some concern regarding the programming of some 10-watt stations. Too much time is spent in entertainment type programs which resemble programs of many commercial stations except without commercials. Unfortunately there are many higher powered educational stations whose programming leaves much to be desired at times. We do not believe that all 10-watt stations should be penalized for the poor operation of a few. There are other regulations which adequately govern this type of situation. The "Promise vs. Performance" is generally a good way to determine whether a station is living up to its intended goals. Short term license renewal and, in extreme cases, license revocation are adequate methods of enforcing compliance with the regulations. We also believe that the plan for educational FM networks would be very expensive for most college FM station budgets, unless there was a plan for federal or state assistance, in subsidizing the network costs.

Respectfully yours,

Don Dick

Don Dick
Secretary, La Sierra College Broadcasting Company
General Manager, KSDA

Roy Steck

Roy Steck
Chief Engineer, KSDA

California

SACRAMENTO STATE COLLEGE
6000 JAY STREET • SACRAMENTO • CALIFORNIA 95819

December 15, 1966

RECEIVED
DEC 29 1966
NATIONAL EDUCATIONAL RADIO

Federal Communications Commission
Washington, D. C. 20554

Re: Docket 14185

The following comments are filed with the Commission on behalf of KERS, Sacramento, California, reflecting the views of the Faculty Advisor and his colleagues on the Radio-Television Committee.

1. We agree with the principle of establishing a table of allocations to promote a more orderly development of the educational FM broadcasting band. However, we suggest the preference given to the development of statewide networks in this broadcast band is inconsistent with the Commission's long-standing position regarding local programming. We feel that concern for the values of local programming, which the Commission has expressed often in regard to commercial stations, should apply equally to non-commercial FM stations. To give first preference to statewide networks in the educational FM band seems to be contrary to the Commission's previous position.

We suggest that where statewide networks are sought to provide in-school instructional broadcasts, the Commission investigate the feasibility of using multiplex SCA transmissions on the audio signal of statewide educational television systems now in existence or now being planned. This would seem to us to be a more

efficient use of the spectrum, since these subcarriers are not now in use. A recent study[1] showed significant differences in the schedules of stations primarily for in-school broadcasts contrasted to schedules of stations aiming primarily for a general audience. Nearly all of the "in-school" stations surveyed confined their service to daytime hours, Monday through Friday. On the other hand, half of the non-commercial stations aiming at a general audience broadcast seven days a week. On weekdays nearly all the latter stations broadcast during evening hours. Therefore, based on this experience, utilizing the TV subcarriers for in-school programming would permit the greatest possible use of the educational FM band for broadcasting for the general public, at hours when more of the general public can be reached.

2. Although we agree that the use of the ten-watt station does not represent the most efficient use of spectrum space, we fear that the nearly total ban on such stations proposed by the Commission will seriously impair the development of the new educational FM stations. Many schools, including ours, took advantage of the small initial investment required for such stations to initiate educational broadcasting. Once in operation, it becomes possible for these stations to demonstrate the potential of such

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[1] Ralph M. Jennings, "The Potentials of Network Educational Radio," NAEB Journal, Vol. 25, No. 5 (September-October 1966), 45-56.

operation in order to generate support for the far larger expenditures necessary for higher power, from either a legislative body or from private donations. We hesitate to see this step-by-step opportunity abolished.

3. We submit that the Commission should consider providing for provisional ten-watt licenses in metropolitan areas. These would call for eventual conversion to higher power by the end of a certain period, five years being suggested.

4. We further submit that the Commission should consider continuing licensing ten-watt stations to communities of less than 30,000 persons without restrictions. The ten-watt station can effectively cover communities of this size, and their relatively small initial cost may permit service to these areas, while the building of a higher power station might be financially prohibitive to the type of institutions of education likely to be located in these communities.

5. Should the Commission decide to eliminate the ten-watt authorizations by requiring such licensees to propose higher power, we feel that a more uniform period of time should be established, and more time be allowed. The proposed rules ("end of his current license period") might be as little as a few months for some licensees and nearly three years for others. Stations licensed to public institutions often face budgetary schedules not shared by the private stations. Often these stations have two budgets in

preparation or being considered. In our case, we currently are preparing our budget requests to the State Legislature for the 1968-69 school year. Should this request be denied by the Legislature, the next budget in which this equipment could be included would be for the year 1970-71, since the closing date for the 1969-70 budget would have already passed by the time the Legislature acts on our original request. For stations owned by institutions operating under such budgetary schedules, the proposed rules would work a hardship. Therefore, we propose that the Commission consider amending its proposal to place the deadline for proposing higher power at the end of the next five-year period, or that each ten-watt licensee be given one regular renewal with the stipulation that he must propose higher power for any subsequent renewal.

6. We share the Commission's concern over the proper use of the educational FM band. However, we doubt that a ban on ten-watt stations will be of any direct help in solving this problem. We suggest, rather, that the Commission consider more carefully the degree of faculty supervision and control over proposed stations, the extent of direct financial support from the institution (as contrasted with student body funds), and the proposed hours of operation before granting licenses to college and university stations. It has been our experience that "student owned and operated" stations, financed primarily by student body funds, rarely have the stability or dedication to educational programming (as contrasted to light

entertainment) shown by stations more directly under university control and financing, although we concede that there are notable exceptions to this statement. However, we doubt that the proposal to delete ten-watt stations will improve programming, unless the Commission also devotes more attention to the methods of financing and supervising of college and university stations. It may well be that the latter would be more effective in achieving programming improvements than would the proposals for higher power.

Gene R. Stebbins

Gene R. Stebbins
Department of Speech

FLORIDA

PINELLAS COUNTY
BOARD OF PUBLIC INSTRUCTION

SCHOOL ADMINISTRATION BUILDING
1960 EAST DRUID ROAD
CLEARWATER, FLORIDA 33517

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ACTING SUPERINTENDENT

December 7, 1966

Mr. Ben F. Waple, Secretary
Federal Communications Commission
Washington, D.C. 20554

Dear Mr. Waple:

I read with considerable interest the Notice of Inquiry relating to Docket Number 14185 in the matter of "Revision of FM Broadcast Rules, Particularly as to Allocation and Technical Standards (Educational FM Channels)" and wish to submit the following comments at your request.

I believe it to be of relevance to state at this time that I am preparing to recommend to the Pinellas County Board of Public Instruction that it authorize the application for a noncommercial, educational FM channel to be used to provide instructional and supplementary materials for elementary, secondary, and junior college classroom listening, as well as to enrich our Pinellas County adult education and community service programs.

The Consulting Engineer engaged to perform the technical studies necessary, Mr. E. H. Munn, Jr., has recommended that we apply for channel 213, 90.5 MHz, with an effective radiated power of 38 Kw, from Pinellas Park, Florida, located midway between St. Petersburg and Clearwater, the two major concentrations of population to be served by the proposed station.

As the membership of the Board of Public Instruction will change in January, 1967, I shall take my recommendation to it as soon thereafter as is deemed feasible. Upon its approval, I shall submit FCC Form 340, technical sections of which have already been completed.

I commend your efforts to encourage the establishment of state-wide radio networks. Indeed, I believe there is being formulated a feasibility study whose concept details a live, interconnected radio network of educational radio stations throughout the State of Florida. The plan calls for a station to be located on the campus of each of the twenty-six junior colleges.

I trust this information may guide you as you prepare the Table of Assignments.

Sincerely,

James F. Gollattscheck

James F. Gollattscheck
Acting Superintendent of Public Instruction

Copies to: Mr. William G. Harley
Dr. Robert Hilliard
Mr. E. G. Burrows
Mr. Jerrold Sandler
Mrs. Marjorie Newman
Mr. E. H. Munn, Jr.
Mr. David E. Platts

FLORIDA

STATE OF FLORIDA
DEPARTMENT OF EDUCATION
TALLAHASSEE
32304

FLOYD T. CHRISTIAN
SUPERINTENDENT

December 9, 1966

RECEIVED
DEC 12 1966
NAT'L EDUCATIONAL RADIO

Mr. Ben Waple, Secretary
Federal Communications Commission
Washington, D. C. 20554

Dear Mr. Waple:

In response to your Notice of Inquiry pertaining to Docket Number 14185 in the matter of "Revision of FM Broadcast Rules, Particularly as to Allocation and Technical Standards (Educational FM Channels)," I should like to file these comments with the Federal Communications Commission.

The State of Florida has long been interested in educational broadcasting as evidenced by the number of educational radio and television stations now in operation and from our state-wide plan for interconnection of educational television stations.

I heartily agree with the Commission's aim of stimulating the growth of state-wide and regional educational radio networks by its assignment of a Table of Allocations throughout the country.

The one plan that I am presently aware of dealing with providing state-wide educational radio coverage for the State of Florida has as its basis the situating of an educational radio station on the campus of each one of our twenty-six junior colleges. The plan calls for live interconnection of these stations.

A wide range of advantages could accrue from such a plan. Using the junior college system would give a measure of unity and standardization of operation to the network and could well serve to further state-wide objectives in education. In addition, it would not jeopardize the service of the six educational radio stations now broadcasting in Florida.

May I therefore request the Commission's consideration of reserving noncommercial, educational FM Channels in the following locations: Pensacola, Valparaiso, Panama City, Mariana, Tallahassee, Madison, Lake City, Jacksonville, Palatka, Gainesville, Ocala, Daytona Beach, Sanford, Leesburg, Cocoa, Bartow, Pinellas Park, Bradenton, Avon Park, Fort Pierce, Palm Beach, Fort Myers, Fort Lauderdale, Miami, Key West and Tampa.

I understand that the Pinellas County Board of Public Instruction has authorized a feasibility study to investigate the use of radio in education. It is probable that the Board will subsequently endorse the establishment of an educational FM Radio Station to be housed on a campus of St. Petersburg Junior College. If so, then this station could well serve to realize the initial step in formulating a state-wide educational radio network as outlined in our plan.

As further information concerning our state-wide plan becomes available, I shall be happy to provide it to the Commission.

Sincerely,

Floyd T. Christian

Floyd T. Christian

cc: David E. Platts
Marjorie Newman
Jerrold Sandler
E. G. Burrows

ILLINOIS

To: Federal Communications Commission
Washington, D. C. 200554

From: Illinois State University
WGLT carrier-current and FM
Normal, Illinois 61761

Subject: Comments regarding FCC Docket No. 14185

Mailed with cover letters (14 copies)
from I.S.U. President Robert Bone
12/21/66

All of the reasons noted in Docket No. 14185 for making educational FM allocation are closely interrelated, and they all reveal serious and very real problems. Revision of FM assignments is definitely necessary to make more efficient use of the spectrum. Many low-power stations may not be presenting programs consistant with their educational license. Networks of educational radio stations would certainly help this medium make a much more significant contribution in individual states, regions, and nationally. Every effort should be made, however, to reserve space for 10 watt stations which can, as some do, meet specialized local educational needs that cannot be met by high-power stations and network programs.

Low-power stations licensed to school districts, individual elementary and secondary schools (both public and parocial), colleges and universities, as well as libraries and museums can and do offer needed educational services. Each individual service may not in itself warrent continuing to authorize 10 watt stations, but a combination of these services in given situations justifies the existence of low-power facilities.

1. Many State Universities located in relatively small cities or towns find themselves growing at a much more rapid rate than the communities in which they exist. These universities already are or are fast becoming a major "industry" in their locale in terms of the number of people engaged as staff and student body, the space occupied in land and buildings, and the economic factors

of construction, public utilities and services used, and purchasing power in relation to the local consumer trade. The problems of communication with communities in which they must function are also growing.

Carrier-current "campus radio" can no longer serve as a useful communications medium for the rapidly expanding university. More students are housed "off campus," more students are commuting greater distances, and as the size of faculties increases they are becoming a less unified academic community. Carrier-current is too limited to serve this scattered audience; high-power stations cannot adequately serve this academic community directly because they are responsible to a much broader audience. For the same reason, the high-power station cannot serve as communication between university and community because these issues would be "too local" for the broader audience. There is a real "communications" need for the 10 watt station.

2. There is also a need for local "cultural" programing. Live coverage of local cultural events and regular broadcasts of local "talent" (University musical organizations, for example, both student and faculty) give impetus to the development of local taste and appreciation. The high-power station committed to a network schedule and serving a large audience and geographical area cannot serve the talent in all of the communities covered. Even recorded music <u>selected for</u> the <u>listeners</u> in a particular community designed to suit their needs and to help develop their

tastes so that they, in turn, will listen to and appreciate network concerts is an educational service. The larger the station, the less chance can be taken with unproven talent--performers, writers, producers with ideas.

3. Networks and production centers will enable us to provide a variety of educational programs. Such facilities would allow us to produce many instructional programs more efficiently both in terms of production costs as well as in the use of resources and talent. Each community, however, has special needs. Differences between regions of the country and from community to community demand different lesson content and teaching approaches. The question of "local control" is not just a matter of States' Rights politics; it is a very real educational need.

For example, a fine series of lessons has been produced in New York designed to teach primary grade youngsters how to listen. But the sounds they are told to listen for are city sounds; the teacher and the students for whom the programs are produced are urban and "eastern" in their total orientation. The program idea, basic teaching techniques, and production are excellent. Mid-western youngsters born in small towns or on the farm would find most of the sounds strange, however, including the New York speech of the teacher. National, regional, and state networks can contribute much of value to education, but they cannot do the entire job. There is a place for the low-power station serving one large community or groups of closely related smaller ones.

4. Low-power instructional radio can also be used to supplement ETV. The local educational radio station is in the best position to assist individual school systems in adapting and making use of state or nationally produced instructional television lessons. Here is where a network of smaller radio stations in conjunction with a state or regional ETV network could be most helpful.

5. Development of multi-channel facilities is yet another area in which 10 watt stations may serve a useful function. Where special audiences who need particular information warrent the cost of the receiving equipment, sub-channels within the individual colleges and universities to meet specific instructional needs is, again, and area best suited to the normal operation of a 10 watt station.

6. Another service that can best be performed by the low-power radio station is that of training students. High-power stations cannot afford to give extensive training and "professional" stations, commercial or educational, have traditionally hesitated to hire college-trained broadcasters because they lack practical experience. Many carrier-current stations do not offer "responsible" experience, but the low-power FM station can.

7. Cost of present equipment and increased costs of high-power equipment, operation, and maintenance are additional factors of concern to educational licensees. 10 watt stations which can be operated all or in part by students, a few key full-time "professionals," with limited faculty involvement, and with a minimum

initial investment in equipment have proved to be a practical means of serving local needs. To scrap this investment or to consider purchasing high-power equipment and hiring additional staff are difficult alternatives. The latter, investing more money, will be impossible for some.

8. Another concern of 10 watt licensees is the responsibility for additional hours and days of broadcast which high-power licensees feel obliged to provide. Combined with cost factors, the freedom to broadcast at convenient times of the day and during the school-year only is, again, a practical solution for the educators who must provide economical use of facilities and staff. In those instances where the training of students is involved, studio and control room equipment may be used while the transmitter is off (during the day or evening as well as during holidays) for training purposes. Those stations with limited space and equipment also need time for experimentation and production.

Because we feel the need for retaining low-power broadcast facilities, Illinois State University, as licensee of educational non-commercial FM station WGLT, respectfully submits the following recommendations for your consideration as you debate the issues contained in Docket No. 14185:

A. Re-allocation of educational FM channels should include provisions for:

1. Adequate assignments of high-power stations to meet educational needs for state, regional, and national networks.

2. Some channels, perhaps only 1 or 2, reserved exclusively for 10 watt stations licensed to serve legitimate local needs. (Local needs would have to be defined and all 10 watt stations encouraged to provide a real service.)

3. Some channels reserved for licensees who could begin as 10 watt stations and increase to a set maximum power as local conditions and needs allow or demand. (Perhaps within a given time limit such as one or two 3-year license periods).

B. Careful study should be made of hours on the air and program requirements for 10 watt stations to assure that such stations will be educational. A minimum number of broadcast hours per week (perhaps 40 to 50) should be required of all 10 watt licensees but with provision for no broadcasts during school holidays.

C. Network affiliation of all educational stations (AM, FM, TV and at whatever power) will have to be carefully planned with provisions for all stations to serve cooperatively in meeting educational needs at all levels.

The results of any changes in allocation and assignment of educational FM channels should be an improved total effectiveness of educational broadcasting in every community and school. Surely an equitable means of assigning these channels can be devised that will allow and encourage the development of network educational radio as a national resource and, at the same time, preserve and encourage the kinds of services which can best be performed by low-power local stations. The Commission has constantly stressed the responsibility of all broadcasters to provide local service.

Given the rules designed to guide and encourage programing consistent with the educational non-commercial license and the limited and inexpensive yet effective facilities of low-power FM stations, the 10 watt licensees can make a valuable contribution to educational broadcasting.

Background Information: WGLT
Illinois State University
Normal, Illinois 61761

Although Illinois State University (until the 1966-67 school year a teacher-training institution) has been interested and active in educational broadcasting for many years, it was not until April, 1961, that a radio station facility was established on the campus. WGLT, carrier-current "campus radio," was authorized as a student organization with a "faculty Sponsor" and duly registered with the FCC. The student staff of WGLT prepared and "broadcast" a variety of programs for their fellow students in the dormitories. Equipment for WGLT has been purchased by the University and space made available in University-owned buildings. Student funds have been allocated for token salaries paid the student "directors" and for program and office expenses. Because the students do not own the facilities, faculty supervision has been moderately successful in maintaining responsible standards of operation and in keeping WGLT from becoming a popular music juke box for the students.

WGLT was authorized to begin broadcasting with a 10 watt FM transmitter at 91.7 mc on February 4, 1966, and the license was received for the period from April 11, 1966 to December 1, 1967. This 10 watt FM operation, like many others, is an extension of the carrier-current station. Application was made for the 10 watt non-commercial license on the basis of a need for a communications medium that could do more for the University and its students as well as a medium with which the University could serve the immediate Bloomington-Normal community. WGLT-FM now reaches the entire student body, faculty, and staff wherever they live in the community, and the student staff of the station is

more directly influenced by the responsibilities of service and exposure to an audience other than their peers. WGLT-FM is still student-operated with a Faculty Sponsor. WGLT-FM is still "owned" by the University with partial support from student funds. WGLT, carrier-current, is still the preliminary training-ground for students, but the FM staff is also composed of trainees.

FM programing is also an extension of carrier-current; however, the WGLT program schedule has always included a variety of programs--all types of music programmed for listening plus discussion of local issues by students, faculty, and townspeople; live and taped coverage of campus and local events from sports to visiting lecturers and performers; student-produced features including some drama; and tapes of both entertainment and information from the United Nations, the State Department, BFA, IBS, and foreign broadcast sources. To the basic carrier-current schedule we have added programs from the National Educational Radio Network (NAEB) and special programs are devoted to the promotion and coverage of local events of interest to both the campus and the community.

The FM program schedule, 7 evenings totaling 51 hours per week, begins with general information and light but listenable music from 6:00 to 8:00 P.M. An appreciative and devoted audience has already been established for "classical" music from 8:00 to 10:00 each evening. News, discussion and music are scheduled from 10:00 to 11:00 P.M. All public service and promotional announcements up to 11:00 P.M. are of interest to the entire community. From 11:00 to sign-off (1:00 A.M. Monday through Friday mornings and 2:00 A.M. Saturday and Sunday mornings)

"Night Flight" is a student-oriented program. We communicate with off-campus and dormitory students by giving them announcements of campus events and the music they want (within reason and the bounds of good taste). We reason that in this community the audience after 11:00 P.M. is primarily students, anyway, and a variety of popular music is played with announcements in a disc jockey format.

WCLT, carrier-current, is on the air from 6:30 to 9:00 A.M. Monday through Saturday and beginning at 3:00 P.M. daily. From 6:00 P.M. to sign-off the carrier-current and FM are simulcast for students in the dormitories who do not have FM receivers. Those who have FM sets, of course, get a better signal.

A great deal of progress has been made with radio at ISU. We have plans to do much more with it.

1. We are preparing to offer more course work leading to a major in radio-TV in the Speech Department.
2. We are investigating the potential of daytime instructional radio for the schools in the community. The local school boards have, so far, been reluctant to use ETV, and we hope to "break the ice" with radio and lead to full and effective use of educational broadcasting.
3. We hope to find ways and means of broadcasting during the summer months and holidays.
4. We are discussing the potential of sub-channels for use on the campus and in the community.

5. As a new facility at ISU and in Bloomington-Normal we are still seeking to discover ways in which we can be of service, and we intend to be looking always for new ways to serve.

Increasing the power of our FM transmitter is a consideration for the future. At present, we are still in the process of establishing radio on this campus as a responsible educational tool and an academic pursuit. Our students are not ready for additional responsibilities; our faculty and staff are not ready for immediate expansion. (Nor have we included such expansion in our 1967-69 biennium budget proposals.) For our students, for this University, and for our community--all of whom we wish to serve--the educational, non-commercial 10 watt license we now hold seems to be the most practical and most useful facility for Illinois State University.

Statement of Intent
from Illinois State University
Licensee, WGLT
December 20, 1966

Illinois State University, licensee for WGLT in Normal, Illinois, will be making application for renewal of license for a period to begin December 1, 1967. At that time we shall request to continue operating WGLT as a 10 watt non-commercial educational FM station for a standard license period of three years. At the conclusion of that license period, we shall propose to increase our power to at least 250 watts, and we contemplate additional increases in following years.

1. We will not be in a financial position to effect an increase in power prior to July 1, 1969, because we operate on a bienium budget as a State institution. We are considering our financial needs in terms of equipment, operating expenses, and staff.
2. We feel that we need at least two or three more school-years to discover the needs and ways in which we can serve our community and any expanded area to be covered with increased power. We also need this additional time to establish educational radio on our campus and in the community and to determine what power we need to do the best job.
3. We know of no possible interference between WGLT and any channel 6 television station or with any Canadian stations.

Despite our intentions to increase the power of WGLT, however, we feel that there is a place in educational broadcasting for the 10 watt stations.

Respectfully submitted,

G. Ben Paxton Jr.

G. Ben Paxton, Jr.
Faculty Sponsor, WGLT
Assistant Professor of Speech
Illinois State University
Normal, Illinois 61761

ILLINOIS

WNTH 88.1 meg.

New Trier Township High School WINNETKA, ILLINOIS

RECEIVED DEC 9 1966 NAT'L EDUCATIONAL RADIO

December 6, 1966

Mr. Jerrold Sandler
National Association of Educational Broadcasters
1346 Connecticut Avenue N. W.,
Washington, D. C. 20036

Dear Mr. Sandler:

Following up my letter of December 2 which enclosed a draft copy of our Reply Comments to FCC Docket No. 14185, I am sending along with this letter a copy of the final form in which these Comments will be presented to our Board of Education prior to forwarding to the Commission.

Our mail continues to pourin from other ten-watt stations expressing considerable concern.

Very truly yours,

DONALD W. ICKES
Faculty Co-Sponsor, WNTH

To: Federal Communications Commission
Washington, D. C.

From: Board of Education, Twp.
High School District 203
Cook County, Illinois
New Trier Township High School

COMMENTS IN REGARD TO FCC DOCKET No. 14185

We note with grave concern the proposals contained in Docket No. 14185 which we feel to be a serious threat to the existence of low-powered non-commercial educational FM broadcasting.

- -

BACKGROUND INFORMATION

1) One of the most valuable and basic qualities of educational radio is that it has been permitted under regulations of the Commission to flourish in a healthy climate of local control by public schools and other licensees who have discovered it to be a unique means of assisting the educational programs of communities which it serves. In a closely related development the Commission has authorized the Instructional Television Fixed Service. One of the major factors inducing schools to consider using this new service is that local control of program content is available to a degree not previously possible.

2) Six years ago the Board of Education of Township High School District 203, Cook County, Illinois, authorized the construction of WNTH pursuant to regulations of the Federal Communications Commission. The station serves the villages of Winnetka, Wilmette, Glencoe, Kenilworth, Northfield, and portions of Northbrook, all of which comprise New Trier Township, Cook County, Illinois. This township is located in north suburban Chicago in a high-density residential area. The combined population of the township is approximately 60,000.

3) With the planning of a second high school now in operation, New Trier became interested in the development of the Instructional Television Fixed Service. Application was made to the Commission for four channels in this service, and call letters KZG-66 were eventually assigned to the Board of Education of the High School district as licensee. The joint participation of the several elementary districts which comprise the Township High School District led to the formation of the New Trier Township Instructional Television

Council. KZG-66 went on the air on November 21, 1966, with programs prepared by local educators designed for virtually all grade levels and in most curriculum areas. As the second high school was constructed, architectural planning was made for a satellite WNTH studio, in order to broaden the base of operations for educational radio in the township. Equipment for this studio has been purchased and is now in process of installation. It was felt advisable to do everything possible to insure quality reception of the WNTH signal throughout the station's primary coverage area, and accordingly the original antenna was later replaced with a four-bay high gain array.

4) The above general facts are presented in order to make it clear to the Commission that this forward-looking high school district has done and is doing everything in its power to provide a superior educational program for the children in its seven combined communities by taking full advantage of the frequencies and services made available to it by the Federal Communications Commission.

- -

STATEMENT OF POSITION

5) It is felt by the Board of Education of New Trier Township High School that the proposals contained in Docket No. 14185 related to ten-watt non-commercial educational FM broadcase stations will work a serious hardship upon school systems and colleges which currently operate at low power levels, and upon WNTH in particular. One of the factors which school administrators must consider in deciding whether or not to embark upon a program of educational broadcasting is that of cost. If the proposals contained in the above docket are put into Rule form, the additional cost of driver units, final amplifier, required monitoring and frequency measuring equipment would be very difficult for the average school system to contemplate. In addition, the probable necessity of having immediately available the services of an engineering person with the FCC First-Class Commercial license would in many cases require the employment of a full-time professional member of the school staff.

6) The initial capital expenses for WNTH did not exceed $10,000, exclusive of real estate and other fixed assets owned by the Board of Education. It has been demonstrated that our ten-watt installation was indeed feasible within the above cost figure, and that the station can be operated effectively for the benefit of the entire township at an annual operating budget of approximately $1,600. For the past six years WNTH has aired approximately 45-60 hours of programming each week during the school year within this budget allowance.

7) It is clear that increased hours of programming, as implied in the Docket, will result in production costs which will be entirely unjustifiable to the school administration. It is already difficult under the present scope of the operation to engage in original program production at the secondary school level. Lenghthening the broadcast day and year would result in cost increases necessitated by expenditures for taped programs, additional production and operating personnel beyond the budgetary limitations of the average school system.

8) We are confident that the technical problems of co-channel spacing and overlapping of coverage areas as discussed in Docket No. 14185 are capable of full solution within the existing frequency spectrum without making it mandatory that low-power stations raise their effective radiated power to the proposed minimums specified in the Docket or suffer the alternative of resigning their frequency allocations. The harmonic relationship of television Channel 6 does appear to present problems in certain geographic locations for both the television station and the radio broadcaster. (We submit that these problems can be solved in the best interest of the general public without forcing the low-power FM broadcaster off the air). In the case of WNTH no problem exists, since the nearest user of Channel 6 is located in Milwaukee, Wisconsin, approximately 70 miles distant and this channel does not serve the Chicago metropolitan area. Other radio stations in this immediate region which operate, as does WNTH, on 88.1 megacycles, have not caused interference to WNTH, nor have we reason to believe that WNTH has interfered within the primary coverage area of any other radio station with a signal on the same frequency.

9) If the proposals in Docket No. 14185 are put into Rule form and compliance with certain commercial station standards were mandatory, an additional hardship would be created for WNTH. The station is presently enabled to utilize

the summer vacation period to teach courses in Radio Workshop, Broadcast Seminar, and Production, using the WNTH facilities while off the air for intensive student training. Pupils culminate their summer workshop experience with a week of live programming at the conclusion of the term. The initial weeks of the school year in the fall are used for similar training purposes. It is during this period that a student staff of almost 100 persons is trained in the operation of the station. We submit that if school stations are forced into broadcast day schedules which are unrealistic in terms of teacher-student time, effort and expense, they will be forced to discontinue their broadcasting, for we place a high premium upon the energies of our teaching faculty and a high premium upon the requirements to be met by the students themselves during their high school years. If the low-power educational station is able to work satisfactorily within the total educational framework of the school, then it has a valuable and unique contribution to make. But if it is to be subjected to the same rigorous standards imposed upon commercial broadcasters it cannot fulfill its educational obligations.

10) We are in agreement with those portions of Docket No. 14185 which show concern for the calibre of programming by some educational stations, and we would endorse the Commission's position that educational broadcasters have a responsibility to the communities their stations serve in this regard. The business of the public school is to educate. The business of noncommercial FM broadcasters is similarly to educate, but it is also a fact that a major part of the business of an educational broadcaster is in the education of the students who participate in the operation of the station. It is these young people, every bit as much as the listener, who benefit from the operation of a secondary school educational FM station. The educational broadcaster has a responsibility to them fully equal to that of his responsibility to his listeners. His station is full of young, enthusiastic and energetic people whose creativity in program production, whose ingenuity in seeking out specid events worthy of community broadcast, whose public speaking abilities and skill at interview are constantly being challenged. More than six hundred students have taken direct and active part in the operation of WNTH since its inception; of these a considerable number have moved ahead to serious study of communications at the college and university level. Indeed, many students who received their first exposure to the broadcast media through their WNTH experiences have distinguished themselves, the station, and New Trier Township High School by having achieved considerable stature in the fields of radio and television.

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CONCLUSIONS

11) In conclusion, the Board of Education of Township High School District 203, Cook County, Illinois, as licensee of educational non-commercial FM station WNTH, wishes to state the following:

(A) In the firm belief that the low power educational FM station has a definite place in the complex of teaching tools at the secondary school level, and in the further belief that a required increase of transmitter power would impost operating restrictions upon such stations which would be entirely unacceptable to public schools in general and upon this Board of Education particularly, it is therefore respectfully requested that the Federal Communications Commission make no Rule which would require the low-power educational FM station either to raise its effective radiated power or to adhere to broadcast standards currently required of commercial stations in terms of hours of broadcast. It is further requested that ten-watt educational stations be permitted to continue their present type of operation.

(B) This Board of Education expresses its willingness to participate in further studies at the request of the Commission in attempt to find solutions to the problems of channel allocation, co-channel usage, the establishment of state or regional networking arrangements and such other problems of mutual concern to the general public, the Commission and the low-power educational FM radio broadcaster.

Respectfully submitted,

Paul C. Goodrich, Secretary
Board of Education, Twp. H. S.
District 203, Cook County, Illinois

Dated at Winnetka, Illinois,
December12, 1966

APPENDIX

REPRESENTATIVE SAMPLING OF PROGRAMS BROADCAST BY WNTH

Stories 'n' Stuff
Tactics of Communism
Medical Milestones
Law in the News
Business Review
The American Cowboy
Ethnic
Behavioral Science Research
Book Fair
Little Orchestra Society Children's Concerts
An Ethnic For Broadcasting
Washington Report
Contemporary Italian Novelists
Introduction to Shakespeare
The Age of Overkill
Carnival of Books
Development of the Individual
Special of the Week
Contemporary Revolution in Latin America
Psychology
Legendary Pianists
World of the Paperback
Great Decisions
France Was There
World of the Conductor
Musical Instruments - Their Story
International Classroom
Modern Biology
The Cartoonist's Art
This Universe of Space
Toward Peace
To Every Man His Due
Anatomy of a Satellite
What a piece of Work Is Man
The Reader's Almanac
The Ways of Mankind
The Border in Question
Classical Drama
Journey Through Sweden
Discriminating About Discrimination
Chicago Lectures
Specials: Viet Nam (4)
This Australia
Georgetown Forum
BBC World Report
Over the Back Fence
Patterns in Living
Your Doctor Speaks
Special: Los Angeles: Portrait of a Riot
Union Voices
Transatlantic Profile
The Nation's Health
Pacem in Terris
Democracy on Trial
Passport to Literature
Australian Profiles
Broadcasting and Election Campaigns
Quackery: Facts and Fallacies
The Two Worlds of Jazz
Portrait of the American
A Matter of Morals
Against the Sky
London Echo
The United States and China
Four Centuries of Italian Theatre
Conscience of a Nation
Scope--The United Nations
The Negro and Higher Education
The World of Folk Music (Social Security Administration)
Vistas of Israel
Auditorium Organ (Church of Latter Day Saints)
These Fruitful Years
Three R's of the Prairie State
American Race Crisis
Guard Session
Torchbearers
Road to Freedom
Dag Hammerskjold Memorial Lectures
Subject: Your Health
Reserved For You
Guest Star (U. S. Treasury Dept.)
German Press Review
Their Other World
Music As you Like It (American Cancer Soc.)
Image of Confederation
Music of Netherlands Composers
Early Man's Basic Needs and Aspirations
Modern Man's Basic Needs and Aspirations
Racial Problems
Religious Problems
Ignorance, Apathy and Prejudice
Problems in Mass Education
Too Many People
Want and Surplus
Nationalism
The Revolution of Rising Expectations
Empires
Colonialism
Dictatorship
Totalitarianism
Republic
Democracy
Socialism
Communism
United Nations
One World or Two
The Rise of Nationalism
Ireland
The Philippines
India
North Africa
Japan
Ghana
Russia
Egypt
China
Indonesia
Hungary
Internationalism

November 30, 1966

Mr. Donald W. Ickes
Faculty Co-Sponsor, WNTH
New Trier Township High School
Winnetka, Illinois

Dear Don:

I don't know whether or not you had had a chance to receive the copy of my inter-office memo or your copy of the attached memo to all radio stations from Jerry Sandler by the time you wrote your letter of November 27.

At any rate, as you know, the FCC's concern, and our's too, is with the whole matter of FM allocations. This has been a problem for some time. Naturally, in considering the overall problem, the various components have to be taken into account -- thus, the interest in what should be done, if anything, in connection with reservations for 10 watt stations.

Our staff is attempting to consider all aspects of the problem, and Jerry Sandler, Jim Fellows (Assistant to the NAEB President), and I are meeting to discuss this at greater length tomorrow. Since I have resigned from the NAEB as of the end of December (to accept a position at the University of Colorado in charge of all radio-television activities and as associate professor of speech), you might want to check with either Sandler or Fellows on the progress of NAEB deliverations, if, indeed, the information that Sandler will automatically send to all member stations does not clarify all the points you have in mind.

I honestly am not aware of whether or not this matter was discussed at Wingspread - I was not there, and have not seen a full report of that conference. However, I can assure you that the NAEB will strive to do what seems to be best for all members. If I were going to be here, I'd be sure you are informed, but I'm not going to be, and I know that Jerry Sandler will keep all radio members informed of what actions are contemplated.

Cordially,

Harold E. Hill

cc: Mr. Jerrold Sandler
HEH:mm Mrs. James Fellows

November 27, 1946

Mr. Orville Bull
National Association of Agricultural Contractors
1000 Connecticut Avenue N. W.
Washington, D. C.

Dear Orville:

I have had a few more interesting telephone calls for help on the beef case on the outcome of FDC Contracts, Inc.

There is very little--a few widespread rumors in this part of the country that FDC is out of the picture, for good and all, but information is extremely scarce as a result of the precautions exercised by persons in this matter.

Only 2 persons on my list know in a <u>sure</u> sense and even so my information came from himself or from counsel that formerly represented him. Both have pointed their significance in terms of long-range prospects, the separation of state and federal matters, and the like. I have heard it rumored, for example, that the Government Corporation Act does not apply in this matter. I don't recall that these problems were reflected in any of the published reports following the hearings.

In this event, we should like some clarification of the Duke situation in this respect. Can it possibly be that the interests of the public outside are being disregarded in settlement? I should appreciate your views on the case.

Please let me have your reactions to this at your earliest convenience. I have been directed to pursue this matter up to the last practicable minute.

Sincerely yours,

Director of Field
Service Headquarters, AFBF

DC:ls
cc

WNTH 88.1 meg.
New Trier Township High School WINNETKA, ILLINOIS

RECEIVED
DEC 5 1966
NAFL EDUCATIONAL RADIO

December 2, 1966

Mr. Jerrold Sandler
National Association of Educational Broadcasters
1346 Connecticut Avenue N. W.,
Washington, D. C. 20036

Dear Mr. Sandler:

By this time, through Harold Hill, you know of our serious concern with FCC Docket No. 14185. I am sending you herewith the second draft of our formal Reply Comments which will be presented to the New Trier Board of Education in regular meeting on December 12. The Superintendent has already cleared this copy. I am getting it to you earlier than its presentation since the time is short all the way around.

You will be also interested to know that we have independently taken the action of notifying every ten-watt station in the entire country, enclosing portions of the Docket and our brief comments on the overall situation. Our mail is already starting to come in with irate expressions from low-power broadcasters: a sample quote - -

> "I was very happy to see that you are trying to do something about the outrageous proposal contained in FCC Docket No. 14185. We have begun preparation on our reply comments and will have them in Washington before the December 30 deadline. XXXX has been on the air for 16 years and of all of the FCC red tape we have gone through, this "takes the cake" .....

We have also been advised that many licensees at the time our letter reached them had not received the Docket from Washington, thus reducing the effective time in which they can prepare replies.

I hope that NAEB will be vigilant in protecting the interests of the "little people" in school broadcasting at this time. We will shortly find out whether we're to be sacrificed to the high-power people.

Sincerely yours,

DONALD W. ICKES
Faculty Co-Sponsor
WNTH

SECOND DRAFT - REPLY TO FCC DOCKET No. 14185 2/

To: Federal Communications Commission
Washington, D. C.

From: Board of Education, Twp.
High School District 203
Cook County, Illinois
New Trier Township High School

COMMENTS IN REGARD TO FCC DOCKET No. 14185

We note with grave concern the proposals contained in Docket No. 14185 which we feel to be a serious threat to the existence of low-powered non-commercial educational FM broadcasting.

- -

BACKGROUND INFORMATION

1) One of the most valuable and basic qualities of educational radio is that it has been permitted under regulations of the Commission to flourish in a healthy climate of local control by public schools and other licensees who have discovered it to be a unique means of assisting the educational programs of communities which it serves. In a closely related development the Commission has authorized the Instructional Television Fixed Service. One of the major factors inducing schools to consider using this new service is that local control of program content is available to a degree not previously possible.

2) Six years ago the Board of Education of Township High School District 203, Cook County, Illinois, authorized the construction of WNTH pursuant to regulations of the Federal Communications Commission. The station serves the villages of Winnetka, Wilmette, Glencoe, Kenilworth, Northfield, and portions of Northbrook, all of which comprise New Trier Township, Cook County, Illinois. This township is located in north suburban Chicago in a high-density residential area. The combined population of the township is

approximately (60,000)

5) With the planning of a second high school now in operation, New Trier became interested in the development of the Instructional Television Fixed Service. Application was made to the Commission for four channels in this service, and call letters KZG-66 were eventually assigned to the Board of Education of the High School district as licensee. The joint participation of the several elementary districts which comprise the Township High School District led to the formation of the New Trier Township Instructional Television Council. KZG-66 went on the air on November 21, 1956, with programs prepared by local educators designed for virtually all grade levels and in most curriculum areas. As the second high school was constructed, architectural planning was made for a satellite WNTH studio, in order to broaden the base of operations for educational radio in the township. Equipment for this studio has been purchased and is now in process of installation. It was felt advisable to do everything possible to insure quality reception of the WNTH signal throughout the station's primary coverage area, and accordingly the original antenna was later replaced with a four-bay high gain array.

4) The above general facts are presented in order to make it clear to the Commission that this forward-looking high school district has done and is doing everything in its power to provide a superior educational program for the children in its seven combined communities by taking full advantage of the frequencies and services made available to it by the Federal Communications Commission.

STATEMENT OF POSITION

5) It is felt by the Board of Education of New Trier Township High School that the proposals contained in Docket No. 14185 related to ten-watt noncommercial educational FM broadcast stations will work a serious hardship upon school systems and colleges which currently operate at low power levels, and upon WNTH in particular. One of the factors which school administrators must consider in deciding whether or not to embark upon a program of educational broadcasting is that of cost. If the proposals contained in the above docket are put into Rule form, the additional cost of driver units, final amplifier, required monitoring and frequency measuring equipment would be very difficult for the average school system to contemplate. In addition, the probable necessity of having immediately available the services of an engineering person with the FCC First-Class Commercial license could in many cases require the employment of a full-time professional member of the school staff.

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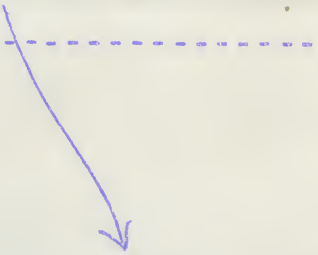
term. The initial weeks of the school year in the fall are used for similar training purposes. It is during this period that a student staff of almost 100 persons is trained in the operation of the station. We submit that if school stations are forced into broadcast day schedules which are unrealistic in terms of teacher-student time, effort and expense, they will be forced to discontinue their broadcasting, for we place a high premium upon the energies of our teaching faculty and a high premium upon the requirements to be met by the students themselves during their high school years. If the low-power educational station is able to work satisfactorily within the total educational framework of the school, then it has a valuable and unique contribution to make. But if it is to be subjected to the same rigorous standards imposed upon commercial broadcasters it cannot fulfill its educational obligations.

10) We are in agreement with those portions of Docket No. 14185 which show concern for the calibre of programming by some educational stations, and we would endorse the Commission's position that educational broadcasters have a responsibility to the communities their stations serve in this regard. 1/* The business of the public school is to educate. The business of noncommercial FM broadcasters is similarly to educate, but it is also a fact that a major part of the business of an educational broadcaster is in the education of the students who participate in the operation of the station. It is these young people, every bit as much as the listener, who benefit from the operation of a secondary school educational FM station. The educational broadcaster has a responsibility to them fully equal to that of his responsibility to his listeners. His station is full of young, enthusiastic and energetic people whose creativity in program production, whose ingenuity in seeking out special events worthy of community broadcast, lore public speaking abilities and skill at interview are constantly being sharpened

More than six hundred students have taken direct and active part in the operation of WNTH since its inception; of these a considerable number have moved ahead to serious study of communications at the college and university level. Indeed, many students who received their first exposure to the broadcast media through their WNTH experiences have distinguished themselves, the station, and New Trier Township High School by having achieved considerable stature in the fields of radio and television.



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CONCLUSIONS

11) In conclusion, the Board of Education of Township High School District 203, Cook County, Illinois, as licensee of educational non-commercial FM station WNTH, wishes to state the following:

(A) In the firm belief that the low power educational FM station has a definite place in the complex of teaching tools at the secondary school level, and in the further belief that a required increase of transmitter power would impose operating restrictions upon such stations which would be entirely unacceptable to public schools in general and upon this Board of Education particularly, it is therefore respectfully requested that the Federal Communications Commission make no Rule which would require the low-power educational FM station either to raise its effective radiated power or to adhere to broadcast standards currently required of commercial stations in terms of hours of broadcast. It is further requested that ten-watt educational stations be permitted to continue their present type of operation.

(B) This Board of Education expresses its willingness to participate in further studies at the request of the Commission in attempt to find solutions to the problems of channel allocation, co-channel usage, the establishment of state or regional networking arrangements and such other problems of mutual concern to the general public, the Commission and the low-power educational FM radio broadcaster.

Respectfully submitted,

Paul D. Goodrich, Secretary
Board of Education, Twp. H. S. District 203
Cook County, Illinois

Dated at Winnetka, Illinois,
December, 1956

RECEIVED
DEC
5
1966
NATL EDUCATIONAL RADIO

November 30, 1966

Mr. Ed Burrows
NAEB
Administration Building
Ann Arbor, Michigan

Dear Ed;

My warm thanks for your very prompt reply to my letter expressing concern over the recent FCC proposals relative to low-power stations.

I should very much like to accept your invitation to join you at the LaSalle Hotel in Chicago on Monday, December 12. If there is no objection I should like to have Dr. Roland Rude, a co-sponsor of WNTH, accompany me.

Undoubtedly there are many facets to the FCC proposal and also to the position taken by NAEB about which we are not fully informed at this point, and before we go off half-cocked we are well advised to learn as much as possible.

As I have previously mentioned, on the other hand, we are anxious to do everything within our ability to protect the interests of our station. We have, for example, just opened a second high school which contains substantial architectural provision for a second studio for WNTH, the equipment for which has been ordered and is now in process of installation. Our original simple antenna has been replaced with a higher-gain type in order to effect the maximum community coverage throughout New Trier Township. Thus we are definitely in business to stay.

We are preparing a reply to the Notice. We'll look forward to seeing you in Chicago.

Sincerely yours,

DONALD W. ICHES
Co-Sponsor, WNTH
New Trier Township High School
(East Campus)
Winnetka, Illinois, 60093

Illinois

WNTH 88.1 meg.

New Trier Township High School · WINNETKA, ILLINOIS

RECEIVED
NOV 25 1966
NATL EDUCATIONAL RADIO

November 22, 1966

Mr. Ed Burrows
WUOM
University of Michigan
Ann Arbor, Michigan

Dear Ed:

We have received today from the FCC a copy of Docket No. 14185 which contains information of grave concern to those school systems such as ours which operate 10-watt educational stations. I assume you have seen a copy.

New Trier, in addition to WNTH, now has on the air a four-channel ITV station, KZG-66, operating in the 2500 megacycle band.

WNTH has operated continuously for six years and is justifiably proud of the calibre of its programs and of the students who by and large operate the station, many of whom have gone into serious broadcast work at the college level.

If I interpret the above docket correctly it would seem to mean that the very existence of 10-watt locally operated stations is threatened. WNTH, as an active member of the NAEB, and specifically of NERN, hopes that the Board of Directors will be equally concerned about the proposals in Docket 14185 and will use whatever influence possible to forestall any FCC action which would eliminate the low-power educational broadcaster who has a real job to do in serving his local community.

Can you suggest anything that we ourselves might do which would be of help?

Sincerely yours,

DONALD W. ICKES
Faculty Co-Sponsor, WNTH

November 23, 1966

Mr. Donald W. Ickes,
WNTH Radio
New Trier Township High School
Winnetka, Ill.

Dear Mr. Ickes:

I appreciate your concern over the possible implications of the FCC Notice of Inquiry dated November 14, 1966. Having discussed at great length with the FCC officials responsible, prior to the issuance of this notice, I can assure you that there is no intent to eliminate the 10-watt stations performing a real job of service to schools and the local community. There are, unfortunately, too many instances of ten-watters operating as purveyors of "routine light entertainment" and showing little or no concern for community needs above and beyond the training or personal gratification of a small number of students. Further, there are instances in which, given the proper stimulation and funds, ten-watt stations would be able to increase power in order to broaden their service to schools or the community. With this in mind, NER has supported the FCC Notice in the hopes that such an inquiry will influence the "delinquents" to become more responsible broadcasters or free their reserved channels for others who want to do the job better.

What should be done now? First, reply to the Notice in as much detail as you are able demonstrating the services performed by WNTH; indicate what additional services might be performed if additional power (and the funds to make this possible) were available; be sure to send a copy of your comments to Jerry Sandler at the NER office in Washington. Second, since NER is working simultaneously to get federal legislation passed which could bring financial benefit to educational radio stations in this country, document the story of your achievements and your plans or hopes for the future in as much detail as possible and forward these to Sandler. Such evidence of service should be in his hands by the first of the year if at all possible.

A number of station managers from Region III are meeting at 9 AM, Monday, December 12 in John Regnell's room in the La Salle Hotel in Chicago to discuss the appropriate documentation needed to support our legislative demands. If you are free, we would be more than happy to have you join us. We intend to break up shortly after lunch. In any event, be assured that I and NER are sensitive to the accomplishments as well as the needs of our membership and will protect the deserving, among which you are numbered, to the best of our ability.

Cordially,

INDIANA

Wilson Junior High School
Station WWHI 91.5 FM
Muncie Community Schools
2000 South Franklin Street, Muncie, Indiana

N. Durward Cory, Superintendent
Fred G. McKinley, Principal

DECEMBER 8, 1966

MR. JERROLD SANDLER
EXECUTIVE DIRECTOR
NATIONAL EDUCATIONAL RADIO
1346 CONNECTICUT AVE. N.W.
WASHINGTON, D.C.

DEAR JERRY,

THANKS SO MUCH FOR THE "CARE PACKAGE" YOU SENT ME NOVEMBER 10. I HAVE BEEN ASSURED THAT OUR BILL WILL BE TAKEN CARE OF. THE FUTURE OF RADIO IN LITTLE MUNCIE ALSO LOOKS BRIGHT. I HAVE BEEN GIVING IN-SERVICE TRAINING TO TEACHERS IN THE USE OF THE RADIO AND ASSOCIATED SERVICES THAT WE PROVIDE. AS ONE OF THE ELEMENTARY SUPERVISORS TOLD ME YESTERDAY, "THE TEACHERS ARE REALLY 'STEAMED UP' ABOUT USING THE RADIO AND RELATED MANUALS IN THEIR CLASSROOMS."

NOW WE COME TO POINT TWO! I, AS WELL AS YOU, HAVE RECEIVED MANY PANIC LETTERS CONCERNING THE RECENT FCC DOCKET NO. 14185. MOST OF THE 10 WATT STATIONS FEEL THAT THEY WILL BE FORCED OFF THE AIR IF THIS PROPOSAL PASSES. I AM PERSONALLY AGAINST THE PROPOSAL AND AM SENDING MY COMMENTS TO THE COMMISSION NEXT WEEK, AT LEAST BEFORE THE DEADLINE. FROM THE NER MEMORANDUM DATED NOV. 25, SOME OF US HAVE QUESTIONS ABOUT NER'S SUPPORT OF THE 10 WATT STATIONS. I WOULD LIKE TO SEE A MEMORANDUM FROM NER SUPPORTING CONTINUATION OF THE TEN WATT STATIONS, IF THEY ARE TRULY OPERATING IN THE PUBLIC INTEREST AND PROVIDING AN EDUCATIONAL SERVICE IN KEEPING WITH THE ORIGINAL IDEA BEHIND THE TEN WATT STATION. I WOULD INVITE AN EARLY REPLY ON MY COMMENTS.

I STATED IN A LETTER TO WNTH, WHO, I BELIEVE, HAS WRITTEN TO YOU ABOUT THIS PROPOSAL, THAT I FELT, HAVING MET YOU, THAT YOU WOULD DO NOTHING TO HURT THE CHANCES OF THE TEN WATT OPERATIONS' CONTINUING.

THANKS FOR ALL OF THE HELP YOU HAVE BEEN IN THE PAST, JERRY, AND KEEP DOING THE FINE JOB NER HAS IN THE PAST FEW YEARS. WE, ON THIS END, APPRECIATE IT.

SINCERELY,

Jim

JAMES F. BAILEY

INDIANA

Franklin College
Franklin, Indiana 46131

RECEIVED
DEC 15 1966
NAET EDUCATIONAL RADIO

RADIO STATION W F C I

December 13, 1966

Mr. Jerrold Sandler
National Educational Radio
1346 Connecticut Avenue N. W.
Washington, D. C. 20036

Dear Mr. Sandler:

Thank you for your letter of November 25 regarding FCC Docket No. 14185.

The staff of WFCI is very much concerned about the proposed phasing out of 10 watt stations. I am enclosing a copy of a letter sent from this college. Dr. Wesley Haines, President of Franklin College, has also written the Commission expressing his concern about the matter.

We shall be glad to cooperate in any way possible.

Sincerely,

Raymond Cowan

Raymond Cowan
Faculty Director WFCI-FM

Franklin College
Franklin, Indiana 46131

RADIO STATION W F C I

December 13, 1966

COPY

Federal Communications Commission
Washington, D. C.

Gentlemen:

On behalf of Franklin College of Indiana I wish to make the following comments on FCC Docket No. 14185 of November 14, 1966, especially in regards to the section concerning the phasing out of ten-watt educational FM stations.

Although I speak only for WFCI-FM I believe my remarks will also apply to many of the other 157 10 watt stations operated by small colleges and local school systems.

Franklin College is a small liberal arts college located in a small town. The college is not only the towns' largest "industry" but is a leader in many of the cultural and educational activities. In fact, the activities of the college are of primary interest and importance to many of the business and professional people of the community. WFCI-FM was established in 1960 primarily to promote and disseminate the activities of the college throughout the community. WFCI-FM broadcasts many programs of community interest, including convocation speakers, college chapel programs, local church services, athletic events, college class sessions, and civic and service club meetings. Its facilities are available without cost for any community project. Out of a total of about 100 operating hours per week, 30 hours are devoted to classical music programming, a type of programming that is seldom heard on the local commercial FM station, and never heard on the AM stations in this area.

In addition to the community activities, WFCI-FM is also operated in the interest of the student body and as a part of the academic program. The station is used as a laboratory for courses in the Speech and Theater Department, and by other departments for lecture and out-of-class discussions. Several class sessions are broadcast each week by a number of academic departments. Although the late evening hours are devoted to "entertainment", the general purpose endeavors to supplement and assist the college in presenting a well-rounded educational program.

Even though the station is student operated it is rigidly controlled by a faculty member who has had many years experience in both the technical and programming end of radio broadcasting and is operated with the highest technical standards.

The cost of the additional equipment required to increase power to Class A operation would in our case, be very difficult to meet at this time, and I also fear that the competition for the limited number of channels available would make it difficult for the small college to receive much consideration.

The suggestion that 10 watt FM stations be replaced by a carrier-current system is not very realistic. Our experience has shown that it is very difficult to provide an undistorted signal without exceeding the FCC radiation limits. About one half of our student body lives off campus in fraternity houses and other residences and would be out of reach of a carrier-current system.

I would like to propose that at least one channel in the class A section be reserved for 10 watt stations as I believe such stations are playing an important part in educational radio.

Sincerely,

Raymond Cowan
Faculty Director WFCI-FM

INDIANA 1/66

WECI FM

Reply to:
BOX 630
EARLHAM COLLEGE
RICHMOND, INDIANA
47374

EARLHAM COLLEGE RADIO
91.5 Megacycles

Area Code 317
962-6561
Extension 268

December 17, 1966

Mr. Jerrold Sandler
National Educational Radio
1346 Connecticut Avenue, N. W.
Washington, D. C. 20036

Dear Mr. Sandler:

Thank you for your memorandum dated November 25, 1966. We at WECI are of course very concerned about this matter and we are preparing our comments to the FCC.

However, since so many stations which are limited in resources are involved, we feel that more must be done. We have found in our investigations that many stations have not even been informed of the proposals in Docket No. 14185. No less a party than the school of Television and Radio at Michigan State University was overlooked by the FCC in its mailing, as was WECI. I have sent to the FCC for a copy and recieved it, though. But the point I am making is that the Commission appears to be railroading this through, consulting as few people as possible, and going through the motions of requesting comments only because they are required by law.

My urgent suggestion to NAEB is that you immediately retain an attorney in Washington to see what can be done. I am now trying to organize the ten-watt stations in Indiana, Illinois, Tennessee, and Kentucky for this porpose, and I have urged the Intercollegiate Broadcasting System to do the same. This battle will take a lot of combined effort.

If possible, I would like to have a copy of your national allocation table.

Sincerely,

Howell L. Gatchell, Jr.

Howell L. Gatchell, Jr.
Station Manager

L

MY TRIP TO WWHI-FM 91.5 MG

WHAT I LEARNED ABOUT WWHI

I. WHAT IS THE NAME OF THE STATION?

WWHI-W (WE) W (WILLINGLY) H (HELP) I (INDIVIDUALS)

WWHI IS OWNED BY THE MUNCIE COMMUNITY SCHOOLS.

WWHI IS AN EDUCATIONAL RADIO STATION. WWHI IS AN FM STATION.

USUALLY---THE CALL LETTERS OF RADIO AND TV STATIONS EAST OF THE MISSISSIPPI START WITH A W. THE CALL LETTERS OF STATIONS WEST OF THE MISSISSIPPI START WITH A K. IN CANADA CALL LETTERS START WITH A C, IN MEXICO WITH AN X.

SOME CALL LETTERS SPELL WORDS: WOOD IN GRAND RAPIDS, MICHIGAN? WIND, CHICAGO, KOOL, ALBUQUERQUE, WERK, MUNCIE.

SOME CALL LETTERS STAND FOR WORDS: WNYC, NEW YORK CITY

SOME CALL LETTERS ARE JUST LETTERS: WXXM, WXYZ.

II. WHEN DID WWHI BEGIN BROADCASTING?

ON OCTOBER 10, 1950. WWHI WAS THE THIRD EDUCATIONAL STATION IN THE STATE AND HAS NOW BEEN JOINED BY 24 SUCH STATIONS. WWHI IS THE ONLY EDUCATIONAL STATION IN THE UNITED STATES WITH STUDIOS AND TRANSMITTER LOCATED IN A JUNIOR HIGH SCHOOL.

III. HOW FAR DOES WWHI'S VOICE OR SIGNAL GO?

18 TO 25 MILES

IV. WHAT ARE THE PROGRAMS ABOUT ON WWHI?

ENGLISH, HISTORY, SCIENCE, MUSIC, SOCIAL SCIENCE, ANTHROPOLOGY, INDIANA HISTORY, AND HEALTH ED. MAKE UP MOST OF WWHI'S PROGRAMS.

V. WHAT PUPILS LISTEN TO WWHI?

MOSTLY PUPILS IN GRADES K THROUGH 6, ALTHOUGH MANY STUDENTS IN GRADES 7 THROUGH 12 PICK UP OUR BROADCASTS FROM TAPES THAT WE HAVE COPIED FOR INDIVIDUAL SCHOOL A-V LIBRARIES. ALSO, ADULTS IN THE COMMUNITY HAVE TOLD US THAT THEY HAVE LISTENED TO OUR BROADCASTS.

VI. WHERE DOES WWHI GET ITS PROGRAMS?

NATIONAL EDUCATIONAL RADIO NETWORK (NER). THE NETWORK OFFERS WWHI PROGRAMS FROM RADIO STATIONS ALL OVER THE UNITED STATES, CANADA, AND THE WORLD. THEY ARE PRODUCED BY TOP COLLEGES, UNIVERSITIES, AND PUBLIC SCHOOL SYSTEMS.

VII. WHAT DO THESE PROGRAMS COST WWHI?

THE COST OF UNLIMITED PROGRAMS FROM NER IS ABOUT THREE CENTS PER STUDENT PER YEAR.

VIII. HOW MANY PROGRAMS DOES WWHI BROADCAST?

(SEE PROGRAM SCHEDULE)

WWHI BROADCASTS 60 PROGRAMS PER WEEK, 32 WEEKS PER YEAR, 1,920 PROGRAMS PER YEAR.

IX. DOES WWHI PRODUCE ANY OF ITS OWN SHOWS?

WWHI AVERAGES 140 RECORDINGS PER YEAR FOR COMMERCIAL BROADCAST OVER WLBC AND WERK.

X. HOW MANY STUDENTS ARE INVOLVED WITH WWHI DURING A BROADCAST YEAR.

ABOUT 500 STUDENTS, ELEMENTARY, JR. HIGH, AND SECONDARY, WILL BE IN THE WWHI STUDIOS TO RECORD DURING AN AVERAGE YEAR.

XI. WHAT SERVICES OTHER THAT BROADCASTS ARE OFFERED BY WWHI?

MANUALS FOR EACH INDIVIDUAL BROADCAST ARE AVAILABLE TO THE CLASSROOM TEACHER, A TAPE REPRODUCTION SERVICE FOR SCHOOLS WANTING INDIVIDUAL TAPED PROGRAMS OR SERIES FOR THEIR OWN A-V LIBRARIES, WEEKLY BROADCAST SCHEDULES FOR TEACHERS WHO REQUEST THEM, YEARLY PROGRAM GUIDE FOR TEACHERS.

RADIO TERMS USED AT WWHI

BROADCAST	PROGRAM	ON MIKE	CUT
EDUCATIONAL RADIO	SOUND PROOF	OFF MIKE	BREAK
AM, FM	STUDIO	DEAD MIKE	TAPE RECORDER
NER	CONSOLE	LIVE MIKE	TAPE
SIGNAL	SOUND EFFECTS	CUE	TRANSCRIPTION
TRANSMITTER	MICROPHONE	STANDBY	LOGS

Copy for your information KANSAS

OTTAWA UNIVERSITY

OTTAWA, KANSAS

December 20, 1966

RECEIVED
DEC 23 1966
NATL EDUCATIONAL RADIO

Federal Communications Commission
Washington, D. C. 20554

Re: Docket No. 14185

Gentlemen:

We make the following comments regarding the proposed rule-making discussed in Docket No. 14185:

Our chief concern is with the future of the 10-watt educational FM stations. Ottawa University has operated such a station, KTJO-FM, since 1951, on a frequency of 88.1 mHz (Channel 201). Our station has emphasized good music, educational programs, and community relations. It has served as a laboratory for courses in radio, taught by the speech and drama department, and it has also aided in the training of students in the physics department. KTJO-FM has thus served the community of Ottawa, Kansas, and it has been an important part of the educational program of Ottawa University. We hope to be able to continue the operation of the station.

Ottawa University is a four-year liberal arts college, founded in 1865. It is located in Ottawa, Kansas, a city of 12,500 population, about 50 miles from Kansas City. The University has been accredited by the North Central Association of Colleges and Secondary Schools continuously since 1914. Enrollment for the fall semester 1966 was 1028. Because of the nature of a liberal arts college, there is no professional department of radio. However, many students who have taken the radio courses in the speech and drama department and/or worked on the staff of KTJO-FM have had training and experience which has been a valuable part of their total educational experience. A number of former staff members of KTJO-FM have also gone into full-time professional work in radio upon graduating from Ottawa University, including Dan Bellus, Robert Palmer, Bernard Hawley, Barry Rohde, Benton Weiss, Ron Walker, and Jon Pritchard. They have worked at all levels of operation, including station manager and network positions. Ross Davidson and Richard Bayha are now in graduate work in radio and

television in other universities. A number of physics majors who gained experience on our station are now in electronics work, including Norris Haight, Don Houser, and Richard Ives. Two of the current staff members of KTJO-FM are now employed part-time by the local commercial station, KOFO.

Current programming of an educational and curricular nature on KTJO-FM includes broadcasting of the weekly lectures of the Social Science Divisional course Man in Society, and review material for the Fine Arts Divisional course Man and the Arts. Programs have also included live performances by music students and faculty, programs of special interest to Ottawa University women, and topics of current interest presented by students in political science.

In addition to the above curricular programs, the following instructional, cultural, religious, public affairs, and public service programs are broadcast by KTJO-FM: The Sunday morning services of the North Ottawa Baptist Church; dramatic radio productions by the radio classes; Election Night, 1966; Campus news; Campus sports; United Nations News; Citizens' Council Forum; Forum of Unpopular Notions; Page Two (Southern Illinois University); Projection; Kansas Afield; Perspective; Layman's Hour; Would You Believe; This Week in Agriculture; Focus on Music; Living Faiths of Man; Face to Face with Yourself; This Restless World; Satellite; Investments. All local sports events of Ottawa University are broadcast by KTJO-FM, and all away games of the University not broadcast by the local commercial station KOFO are carried by KTJO-FM.

Most of the programs described above are not available from other stations received in Ottawa. Moreover, the only FM stations received in Ottawa which emphasize good music are KXTR, KANU, and KTJO-FM. KXTR (Kansas City) does not put a strong signal into Ottawa, which leaves KANU (the educational FM station of the University of Kansas) and KTJO-FM as the only satisfactory signals carrying the kind of music for which FM is especially suitable. If our station were taken off the air, our listeners would be deprived of this good music, carried by KTJO-FM, as well as most of the special programming listed above.

Ottawa is not served by a TV station on Channel 6, and consequently KTJO-FM does not interfere with any TV station. In fact, some listeners in Ottawa use Channel 6 on their TV sets to receive KTJO-FM. FM channel 201 is a suitable channel for this area.

In our operation we do not have staff members giving full time to radio. Dr. W. D. Bemmels, Professor of Physics and Dean of

the College, holds a First-Class Radiotelephone license and supervises the technical operation of KTJO-FM. Mr. Michael S. Twedt, Assistant Professor of Speech and Drama, supervises the programming and the general operations of the station. For our type of operation, the simplicity of the FCC regulations for the 10-watt educational FM station is ideal. The costs of operation come from the University budget, and since Ottawa University is a private institution, the economy of the 10-watt station is important to us.

Moreover, we find the 10 watts e.r.p., with our present antenna, to be adequate to serve the city of Ottawa and our campus. If we were required to go to higher power, the added financial burden of installation and maintenance of the added equipment would be important to us.

When the license for KTJO-FM was issued in 1951, many of the commercial stations had tried FM and had given it up. Operations such as ours, with programming of a cultural level not available on the AM channels, and with programming peculiarly suited to the technical advantages of FM, helped to bring FM along to its present state of popularity.

Ottawa University has operated a campus-limited carrier-current AM station since 1942. When KTJO-FM was put into operation, the carrier current station was not discontinued. It "simulcasts" the KTJO-FM programs, but it also carries light music for students at times of the day when our FM station is not on the air.

In view of all of the above considerations, we hope that no rule changes will be made which will interfere with operations of KTJO-FM with its present transmitter power output and on FM channel 201. Since slightly more than half of the existing educational FM stations are operating with a transmitter power output of 10 watts or less, those stations surely represent an important and significant broadcast service.

Sincerely,

Andrew B. Martin

Andrew B. Martin
President

ABM:am

Maine

WRJR(FM) 91.5 MEGACYCLES
BATES COLLEGE, LEWISTON, MAINE

RECEIVED
JAN
25
1967
MATL EDUCATIONAL RADIO

December 28, 1966

Federal Communications Commission
Washington, D. C., 20554

Gentlemen:

This communication is being sent in response to FCC Docket No. 16185 adopted November 9, 1966, and released November 14, in the matter of revision of FM broadcast rules for educational FM channels. Our concern is primarily with two items: low power (ten watt) operation and the type operation which is to be considered "educational."

In areas of the country where population is concentrated the public interest may well require a greater area of coverage than a ten watt transmitter can provide. Considering, however, the number of colleges located in relatively small communities, it would appear that low power operation which permits less stringent requirements for engineers would operate to the benefit of the community and allow greater utilization of the spectrum with no concomitant hardship resulting to the nationwide situation. In brief, we would agree that the Commission's proposal may be justified for areas of substantial population density, but the proposed allocation table should also permit the continued operation of ten watt stations as a matter of course - not exception - in areas of small population congestion.

One sentence on page three of the docket refers to "programming consistent with the educational purpose for which the non-commercial educational FM band is designed." With only slight subsequent development of this concept, the implication seems to be that non-commercial educational programming should be instructional or at least more esoteric in nature than that of commercial broadcasting. Many of us do not feel that this is necessarily so. Concerning this matter of interpretation, definition one of "educational" in Webster's New World Dictionary (College Edition, page 461) is "relating to education," with definition one of "education" being "the process of training and developing the knowledge, skill, mind, character, etc., especially by formal schooling; teaching, training." Usage of ten watt FM facilities to further those goals by operation as a practical laboratory seems completely justified where course offerings must necessarily be limited and circumstances make carrier current operation nonfeasible, not to mention the greater motivation on the student's part for excellence of performance when he is well aware that he is broadcasting to the community at large rather than merely within the confines of the campus. Such operation also seems to be within the realm of the public interest in the many areas where the programming of commercial FM stations may be complete duplication of their AM schedules.

Consequently, this letter is submitted as a plea for the continued operation of low power educational FM stations and a tolerant and liberal interpretation of educational programming.

Sincerely,
Richard J. Wargo
Richard J. Wargo
Director of Broadcasting

(C O P Y)

Thank you for your mailing of Nov. 25.

Massachusetts

15

WGBH
Lowell Institute Cooperative Broadcasting Council
Educational television Channel 2, FM radio 89.7 mc
125 Western Avenue, Boston, Massachusetts 02134
UNiversity 4-6400

January 18, 1967

Mr. Chalmers H. Marquis
Executive Director
Educational Television Stations
1346 Connecticut Avenue, N.W.
Washington, D.C. 20036

Dear Chuck:

Enclosed are my notes on the outline for comments to be developed for presentation to the Federal Communications Commissions in connection with their inquiry into development of an educational FM allocations plan. They are necessarily brief in order not to miss by too much the January 16 deadline!

I believe Mike Hobbs has reported to you that WGBH plans to submit its own comments in this proceeding. He expects to have a draft very shortly, and we will send you a copy when we get to that point.

Best wishes,

Sincerely,

Hartford

Hartford N. Gunn, Jr.
General Manager

Enclosures

EDUCATIONAL TELEVISION STATION
RECEIVED
JAN 20 1967

Council Members
Lowell Institute, Boston College, Boston Symphony Orchestra, Boston University, Brandeis University, Harvard University, Massachusetts Institute of Technology, Museum of Fine Arts, Museum of Science, New England Conservatory of Music, Northeastern University, Simmons College, Tufts University, Yale University
Affiliations National Educational Television, Eastern Educational Network, National Association of Educational Broadcasters, Eastern Educational Radio Network

WGBH
Lowell Institute Cooperative Broadcasting Council
Educational television Channel 2, FM radio 89.7 mc
125 Western Avenue, Boston, Massachusetts 02134
UNiversity 4-6400

Comments - Docket 14185
Proposed Table of Educational FM Channels

3.A. 2. - Regional networking: Eastern Educational Radio Network, which depends on high-power "key" station for off-the-air pickup and relay from Boston-Amherst, Mass.-Albany, N.Y. The rest of the network (south along the eastern seaboard) presently depends on tape exchange, but would hope to be able to move eventually to off-air pickup and relay.

3.A.3. - Live stereo broadcasts by WGBH-FM of local community cultural events. Stereo requires more power to put the same quality signal the same distance. News and public affairs: coverage of developments in the state capital is of importance to the entire state. This requires high power for (1) broad coverage area (2) inexpensive off-the-air networking.

3.A.5. - See comments above. Because of diversity of services and sources of support for educational radio stations, the Table of Allocations should provide for diversity in facilities. Educational radio which are not part of a school or university budget require a broad base of voluntary financial support, which high power and wide coverage area are virtually essential to insure. Likewise, there are many areas which, for the foreseeable future, would be totaly lacking educational radio service absent high power stations. (An example is Cape Cod in Massachusetts.)

3.C. - Everything possible should be done to encourage 10-watt operations to (1) seek higher power, and (2) broaden their service to the community. As educational radio matures as a total community service, there is less need for, or justification for, operations which are so limited in scope and power.

Council Members
Lowell Institute, Boston College, Boston Symphony Orchestra, Boston University, Brandeis University, Harvard University, Massachusetts Institute of Technology, Museum of Fine Arts, Museum of Science, New England Conservatory of Music, Northeastern University, Simmons College, Tufts University, Yale University
Affiliations *National Educational Television, Eastern Educational Network, National Association of Educational Broadcasters, Eastern Educational Radio Network*

MINNESOTA
14185
PDCS

STATEMENT BY THE UNIVERSITY OF MINNESOTA

This statement has been prepared to indicate the support of the University of Minnesota for federal legislation to supply funds for the construction of education FM radio stations. It falls into two sections: I. A Review of Radio Broadcasting at the University of Minnesota; and II. The Potentials for Minnesota of an FM station and Network.

I. A REVIEW OF RADIO BROADCASTING AT THE UNIVERSITY OF MINNESOTA

The University of Minnesota operates one of the oldest educational radio stations in the United States, since it first licensed WLB on January 13, 1922. In 1938 the University greatly expanded its broadcasting operations when WLB changed its frequency from 1,250 to 760 (later 770) kilocycles; raised its power from 1,000 to 5,000 watts; and expanded its schedule from 8½ to an average of 40 hours per week. The station's call letters were changed to KUOM in 1945.

KUOM now broadcasts from 10:30 a.m. to sunset, which varies from 4:30 p.m. (CST) in December to 9:00 p.m. (DST) in June and July. Early morning hours, the period from 12:30 to 2:00 p.m. on Saturdays, and all of Sunday are assigned to WCAL the St. Olaf College station in Northfield.

KUOM is programmed by the Department of Radio and Television at the University of Minnesota, a department of the University's General Extension Division. The Department of Radio and Television also is responsible for University of Minnesota broadcasts over KTCA-TV, the Minneapolis-St. Paul educational television station, as well as for closed-circuit television on the campus of the University. KUOM's major services, outlined briefly below, include lectures and discussions; news broadcasts; programs for in-school use; fine music; and many general informational and cultural offerings.

Public Affairs Forum. During a typical year, over 250 talks, discussions, and lectures are broadcast on "Public Affairs Forum," heard five days a week from 1:30 to 2:15 p.m. The best of these are re-broadcast each summer in the evening as "Significant Speeches."

At a time when many stations increasingly adopt the once-over-lightly approach to the world's problems, KUOM emphasizes serious and responsible discussions of the fundamental issues facing the community, state, nation, and world. Programs come from various sources: the University of Minnesota, Macalester, and other college campuses in Minnesota; the wide range of public meetings and events in the Minneapolis-St. Paul area; and the tape network of the National Association of Educational Broadcasters.

An outstanding example of a lecture and discussion series was KUOM's coverage of the 1965 session of the Minnesota State Legislature.

This project involved cooperation among the KUOM staff, the University of Minnesota's Department of Political Science, the League of Women Voters, the League of Minnesota Municipalities, and the Minnesota Citizen's League, to mention only a few. The programs were presented during various morning and afternoon hours between January 8 and May 6, 1965. Members of the State Legislature, professors and other specialists in the political process, and citizens with an interest in legislative problems, took part. (Appendix A lists the dates, subjects, and speakers for all broadcasts in the series.)

Between 30 and 50 telephone calls and letters are received each week about Public Affairs Forum nd similar broadcasts, including many requests for copies of talks and additional information about the speakers. During the 1960-62 biennium, KUOM distributed over 2,300 transcripts of talks, lists, study guides, and similar materials. In addition, through cooperation with the General Extension Division's Audio-Visual Extention Service, tape recordings of many of these programs are distributed to schools, colleges, clubs, and individuals.

Programs of this type require a great deal of cooperation with organizations throughout this area. These groups serve as advisors in planning; provide the station with much program material; invite us to record their talks and discussions; and assist in securing participants and promotion. (A list of the groups with which the station cooperates in a typical year is attached as Appendix B.)

Other Talks and Lectures. Periodically since the late 1930's, KUOM has broadcast courses direct from University classrooms. These have covered an extremely wide range of subjects: American Government and Politics; Government and Politics of the British Empire; History of the South; Nationalism and Social Change in Asia; the Geography of Minnesota; Humanities in the Modern World; and many others. Reading guides and study outlines are distributed upon request to listeners, and recordings of many lectures have been made available for general circulation through the Audio-Visual Extension Service. A few listeners have made study projects out of these by enrolling in correspondence courses paralleling these classroom lectures.

Unique was an experience with the series, "America in Perspective," given by Professor Clarke Chambers of the Department of History to a foreign student orientation group in the Fall of 1960. These were recorded for broadcast during December of the same year with excellent audience response. Subsequently they were given world-wide distribution through repeated broadcasts by the Engligh-language service of the Voice of America.

News. In view of the large number of news programs on radio and television, KUOM periodically re-examines its news broadcasting policies. But because so many news programs are of the "Around the World in Five Minutes" type, we continue news broadcasting, emphasizing significant news in depth, presented without commercial interruptions.

KUOM has fifteen-minute newscasts daily at 12:15 and 4:30 p.m. These are based on Associated Press reports, frequently supplemented by beeper telephone interviews with University faculty members and others, to supply background material.

The station also presents "The Background of the News," a daily fifteen-minute program of supplementary information. In addition to reports on the foreign press prepared by the broadcasting organizations of various European countries, these include short talks and interviews with qualified local experts to discuss current affairs.

Minnesota School of the Air. The University of Minnesota began broadcasting programs for in-school use in September 1931, and formally inaugurated the Minnesota School of the Air in September 1938. During a typical year, ten or more fifteen-minute programs are broadcast every week. Designed for in-school use, and to supplement rather than replace the teacher, the Minnesota School of the Air presents programs on literature, composition, natural sciences, history, health, current events, and other school subjects for students in the primary and elementary grades.

Minnesota School of the Air programs have repeatedly received awards from Ohio State University and similar groups; have been chosen for distribution on tape by the National Association of Educational Broadcasters and the Division **Audio Instruction of the National Education A**ssociation; and tape recordings of them are greatly in demand in Minnesota and surrounding states through the facilities of the General Extension Division's Audio-Visual Extension Service and the Audio-Visual Service of the Minnesota State Department of Education.

Audiences for Minnesota School of the Air programs have always been substantial. The last general survey, made in 1961-62, and based on a four-page questionnaire mailed to 1,612 teachers in Minnesota schools, indicated a minimum weekly audience of 20,000 and a maximum audience of 39,500 regular in-school listeners. In 1965-66, on the basis of 1,536 teachers' manuals sold, we estimate 53,760 students, on the assumption that there are at least 35 pupils listening for each teacher's manual. In addition to this, the audience for "Let's Write," developed for the Minneapolis public schools, is reported by them as exceeding 8,000 students per week. A majority of the 800 tapes distributed by the Audio-Visual Extension Service are of Minnesota School of the Air programs, and, even if each of these were played only once, it would reach a normal sized class of some thirty sutdents.

Music. KUOM has broadcast significant music regularly since the 1920's. Depending upon the sign-off hour, the station schedules from 13 to 30 hours of music each week.

From 1938 until 1962, KUOM broadcast all the Young People's Concerts of the Minneapolis Symphony Orchestra given in Minneapolis and St. Paul, as well as other concerts by the Orchestra. For several years in the late 1950's, recordings made at rehearsals were edited down for a 45-minute concert preview on the day before each Friday evening subscription concert. For several years in the late 1950's, KUOM recorded the Orchestra's Friday evening concerts for broadcast during the summertime.

These recordings were resumed in 1965-66 and 1966-67, when they also were syndicated to a number of commercial stations throughout this area.

Since the middle 1930's the University station has broadcast previews of all the Orchestra's subscription concerts. During these programs, talks and analyses of the music, together with interviews with guest artists and conductors, have been supplemented by recordings of the music. In preparation for some Young People's Concerts, the conductor and others have come to the studios to broadcast instructional materials for in-school use.

KUOM's record library is called upon daily for morning, afternoon, and evening programs which run the gamut of serious music. These commercial recordings have been supplemented by a wide range of tape recordings from the best music festivals of Europe. During the last several years, these have included recordings from some East European countries seldom heard on American radio stations. To the greatest extent possible, live concerts by University of Minnesota Music Department faculty members, students, and other artists, also are a part of the station's schedule.

With music as in other fields, KUOM cooperates with a great many groups. In addition to working with the Minneapolis Symphony Orchestra and the University Artists' course, the station has contributed to the enjoyment of concert goers by previewing concerts

presented by such groups as the New Friends of Chamber Music, the Schubert Club, the St. Paul Chamber Orchestra, the Minneapolis Civic Orchestra, Temple Israel, the Bach Society, the Minneapolis Symphony String Quartet, the Center Arts Council, the Center Art Company, and the Minneapolis Institute of Arts.

Cooperative Extension Programs. The Institute of Agriculture on the St. Paul campus of the University of Minnesota has presented "The University Farm Hour" regularly since the early 1930's, and now does five programs a week from 12:30 to 1:00 p.m., it offers the "Homemaker's Quarter Hour," Monday through Friday from 10:45 to 11:00 a.m., and occasional special programs calling upon the wide range of skills found on the St. Paul campus of the University. A staff of three is in charge of these and the other radio and television offerings of the Institute of Agriculture.

Miscellaneous Programs. In addition to the major program areas outlined above, KUOM presents many other features, of which a few have been chosen as examples:

"Listen with The League." A weekly fifteen-minute program now in its fifteenth year, in which members of the League of Women Voters interview important local, state, and national figures about current issues of importance. The station's long cooperation with the League is an example of how it involves community leaders in its broadcasting.

"Community Calendar." A five-minute daily report on educational and cultural activities in the Twin Cities and suburbs. Over a hundred organizations use this service to build audiences for their lectures, talks, plays, concerts, exhibits and other public events.

"Doctor, Tell Me." A health series in which general practioners and specialists take part in five-minute interviews each week day with a station staff member. These are developed cooperatively with the Minnesota State Medical Association; are recorded for use by 56 stations in Minnesota; and also are distributed through the facilities of the National Association of Educational Broadcasters to 51 stations in 23 states. During a typical year, from 30 to 40 doctors participate in these broadcasts.

"Minnesota Theatre of the Air." Since the late 1930's KUOM has done much to develop radio drama. During a typical year the station produces between 25 and 50 dramatic programs, ranging all the way from a short version of O'Henry's Ransom of Red Chief to a two-hour production of Marlowe's Edward II. Strindberg, George Bernard Shaw, Shakespeare, Chekov, Henry James, Oscar Wilde, Ibsen, Anouilh, MacLeish, Mark Twain, Maeterlinck, Arch Oboler, and Dalton Trumbo, are representative of the authors whose works are broadcast.

II. THE POTENTIALS FOR MINNESOTA OF AN FM STATION AND NETWORK

With its long background of experience in AM broadcasting, the University of Minnesota is fully prepared to make effective use of FM. A single station would provide coverage of the metropolitan Minneapolis-St. Paul area; a network would bring these programs to the major population area of Minnesota and also could provide studios for the origination of programs elsewhere in the state.

Since any station or network would draw upon the programming potentials, not only of the University of Minnesota but also of many other educational and cultural organizations in this area, it's potential resources would be tremendous. In future years interconnections could be made between the educational FM network in Minnesota and those of surrounding states, which would provide a still greater range of program sources and distribution.

An FM station would provide the University and other Twin City educational groups with an evening radio outlet, something impossible with the University present AM facility. The most frequent question asked by KUOM listeners throughout the years has been, "Why don't you broadcast in the evening?" As pointed out above, the sunset sign-off requirement means that KUOM can never broadcast later than 9:00 p.m., and in mid-winter must sign-off at 4:30. In addition to limiting the hours available, the requirement for irregular sign-offs poses the difficulty of building audiences for programs available during only a few months each year. Furthermore, the latest hours are in the summertime, when the audience for serious material is not as large as during the winter.

Additional time would make it possible to both extend and enrich KUOM's services. At present there are not enough hours for much available material, such as lectures, seminars, and concerts.

An extension of time also would make it possible to utilize many fine programs from the British Broadcasting Corporation, the National Association of Educational Broadcasters, the Canadian Broadcasting Corporation, the Broadcasting Foundation of America, and other local, state, regional, national, and international sources, which cannot be used now due to time limitations.

Even more important, however, is the fact that the multiplexing capability of FM would enable us to serve simultaneously both the general public and various special audiences. On its main channel KUOM-FM could offer significant public affairs, news, special events, fine music, and other programs for general audiences, at the same time that subcarriers were used for special-interest materials.

Broadcasts for in-school use now are limited to 10 or 12 15-minute periods per week. If a subcarrier could be used for such material however, more programs could be presented, and each could be repeated several times for the convenience of the classes concerned. In view of our continuing success with in-school programming since it was begun 35 years ago, the potential of a special carrier would be tremendous.

Subchannels could be used for in-service teacher education as well as for broadcasts designed for children and young people. School superintendents might wish to broadcast on a regular schedule to their teachers in city systems; scheduled meetings with school boards of comparable school districts could help members explore

mutual problems; workshops in specialized materials -- languages, literature, health, music, etc. -- could be conducted for more teachers; and State Department of Education subject matter consultants could report and advise out-in-state teachers.

The number and types of programs presented for in-school student listening could also be greatly expanded. In addition to more regular series, broadcast more often, special programs might include school concerts by the Minneapolis Symphony Orchestra; regularly scheduled programs to supplement the work of visiting teachers for the home-bound child; inter-school broadcasts of band rehearsals, school choir practices, instrumental sessions, etc., with evaluation by appropriate music consultants; and all-school convocations for children of various levels with local and national leaders talking specifically to the children on such subjects as civic responsibility, air pollution, civil rights, and family life education.

Services for agriculture, offered by University radio since the 1930's could be tremendously expanded with FM multiplex. Developed from the resources of the Cooperative Extension Service of the University's Institute of Agriculture, these could include lectures, conferences, and discussions, for general groups as well as for specialists in different types of farming, 4H club groups, and people concerned with the business aspects of agriculture. The county agent organization could be utilized not only to plan such programs, but also to develop audiences for them and to assure effective ulitization.

The General Extension Division of the University has established special services in continuing education for women, lawyers, engineers, business administrators, pharmacists, dentists, and doctors, among others. The Continuing Education of Women is an example. Many well-educated women are working in jobs below their capacity because of the difficulties they encounter in returning to work because their skills and knowledge are outdated. Radio courses might help these women re-enter the labor market at a higher level, thus benefiting both themselves and society. Four groups of women could particularly benefit from educational FM programs: women with small children who find it difficult to attend on-campus classes; women in small communities some distance from the University who need more specialized courses than are conveniently available to them; women interested in continuing their education, but who must minimize tuition expenditures in order to favor college attendance by younger members of their families; and, women who could be more effective in community volunteer activities if they had the broader knowledge available from courses adapted to their needs and interests.

Continuing business education is another promising field. If FM multiplex broadcasts were combined with telephone talk backs and electro-writers, continuing business education seminars could be offered. Much work also could be done in medical and dental fields.

A number of medical centers throughout the country utilize FM in post-graduate and continuing education, but the absence of FM facilities here has prevented such developments in Minnesota, despite the excellent teaching resources of the Medical School at the University and of the Mayo Clinic in Rochester. Broadcast services could be developed not only for general practioners, but also for hospitals and workers in related æeas like public health nursing.

Responding to the great demand for better sex education in homes, schools, and churches, the University's General Extension Division has appointed a Coordinator for Parent and Family Life Education to conduct courses for parents, church groups, PTA's, social agencies, educators, and others. In September 1965, the University's first Sex Education Institute was attended by more than 400 educators, religious educators, social workers, nurses, and parents. Two subsequent institutes have been even more successful, and one experiment was conducted in which a telephone installation was used for a tele-lecture followed by questions from the audience. Multiplex FM, developed first in the Twin Cities and then on all all-state basis, offers many possibilities for Parent and Family Life Education.

Pharmacy education is another field. The Director of Continuing Pharmacy Education is now in the initial stages of

developing a program for registered pharmacists in the state. A peculiar problem in the post-graduate education of pharmacists is the fact that a pharmacist must be at attendance at all times in a drug store. This means, therfore, that since the audience cannot come to us, we must come to it, and late evening or Sunday morning FM programswould provide the means.

The University of Minnesota and the Minnesota State Bar Association are working together to develop a state-wide project in continuing legal education which could make good use of FM facilities. Through live broadcasts and telephone connections, lectures by outstanding authorities in various fields of law could be brought to members of the bar in all parts of the state, followed by discussions of the points raised during the talks.

The World Affairs Center, another department in the General Extension Division, has carried on a very active world affairs education program for some years, organizing many meetings, discussions and seminars for people of all ages. FM subcarriers could be used to offer in-service training programs to social studies teachers, and lectures and talks to clubs and organizations. The large group of organizations which works cooperatively with the Minnesota World Affairs Center could be drawn upon to develop subject matter, plan presentations, and stimulate effective utilization.

Courses for credit based upon high school, college, and University sources are the last example to be cited here of the potential uses of an FM multiplex facility.

The University of Minnesota alone, with its thousands of offerings in day school, evening classes, and correspondence study, and drawing upon over twenty-five years experience in broadcasts from its own classrooms, is prepared to experiment extensively in developing credit courses for the general public as well as for special interest groups. These would utilize not only the resources of the General Extension Division, but also of the University's many other divisions and colleges.

The University of Minnesota, therefore, urges the Congress to provide funds with which to construct educational FM broadcasting facilities. But for the absence of such funds, the University would have constructed and operated an FM station long before now. But confronted with requests from its many departments to support their varied and extensive activities, the University Administration has been unable to find money for an FM radio station. When support becomes available, however, the University will construct and operate a station in the Minneapolis/St. Paul area, drawing upon the extensive resources of the Twin Cities in programming it. Thereafter, the University will work cooperatively with other educational institutions, both public and private, to construct additional transmitters elsewhere in Minnesota, together with studio facilities where required. These would be then used in developing a statewide educational FM service.

APPENDIX A

KUOM PROGRAMS PERTAINING TO THE 1965 LEGISLATIVE SESSION

(all dates are 1965)

Friday, January 8 - 4:45 p.m. - Legislative Report #1
Interview with Professor Lloyd Short on the Legislative process

Monday, January 11 - 1:30 p.m. - Lt. Governor A.M. Keith, "Pressing Problems before the Legislature," address and Q & A session recorded at Citizen's League meeting

Tuesday, January 12 - 11:15 a.m. - League of Women Voters interview with Rep. Howard Albertson (C-Stillwater), chairman of House Metropolitan Affairs Committee

Thursday, January 14 - 1:30 p.m. - Dr. G. Theodore Mitau, James Wallace Professor of Political Science, Macalester College, "Backgrounding Re-Apportionment"

Friday, January 15 - 4:45 p.m. - Legislative Report #2
Summary of developments to date in the legislature

Monday, January 18 - 1:30 p.m. - Former Representative Douglas Head (C-Minneapolis), "The Legislature--Viewing the Inside from the Outside"

Tuesday, January 19 - 1:30 p.m. - House Speaker Lloyd Duxbury (C-Caledonia), "The Legislature--Viewing the Inside from the Inside"

Thursday, January 21 - 1:30 p.m. - Dr. Charles Backstrom, associate professor of political science, University of Minnesota, "The Role of the Legislator"

Friday, January 22 - 4:45 p.m. - Legislature Report #3

Monday, January 25 - 1:30 p.m. - Legislative Issues: Taxation
Participants: Dr. Arthur Borak, economist, University of Minnesota, "Minnesota's Tax Alternatives"; Senator Donald O. Wright (C-Minneapolis); Senator Paul Thuet (L-South St. Paul)

Tuesday, January 26 - 1:30 p.m. - Legislative Issues: Reapportionment
Frank Farrell, attorney, Member of Governor's Citizen's Commission on Reapportionment

Friday, January 29 - 4:45 p.m. - Legislative Report
State Support of Education: Revising the School Aid Formula

Monday, February 1 - 1:30 p.m. - Legislative Issues: Reapportionment
Symposium: "Should apportionment be by population only?"
Participants: University Law Professor John Cound; Rep. Robert Kucera and Joseph Graw; Senator Richard Parish

Thursday, February 4 - 1:30 p.m. - "The Legislature and the Constitution" Dr. Charles Backstrom, associate professor of political science, University of Minnesota

Friday, February 5 - 4:45 p.m. - Legislative Report
Interviews with Rep. William Frenzel and Rep. Alpha Smaby

Monday, February 8 - 1:30 p.m. - Metropolitan Problems and the Legislature Representative Howard Albertson (C-Stillwater), Representative Alpha Smaby (L-Southeast Minneapolis), Representative William Frenzel (C-Golden Valley)

Friday, February 12 - 4:45 p.m. - Legislative Report: University Salary Increase, Dean E. W. Ziebarth and Assistant Vice President Donald K. Smith

Monday, February 15 - 1:30 p.m. - The Legislative Process, Lecture #3 Dr. Charles Backstrom talks about the role of organization in the legislature

Thursday, February 18 - 1:30 p.m. - Legislative Issue: Taxes Representative Robert W. Johnson (C-St. Paul) Discusses Prospective Tax Legislation with the Citizen's League of Minneapolis

Friday, February 19 - 4:45 p.m. - Legislative Report: Higher Education Mayor Arthur Naftalin of Minneapolis, Former State Commissioner of Administration explains his position on the co-ordination of higher education in Minnesota

Monday, February 22 - 1:30 p.m. - Legislative Issues: Metropolitan Problems. Rep. Robert Ashback (C-Arden Hills) discusses Metropolitan Sewage Disposal: Rep. William Kirchner (C-Richfield) talks about transit problems

Tuesday, February 23 - 1:30 p.m. - Legislative Issues: Metropolitan Problems Rep. Connie Burchett (DFL-Anoka) discusses inter-governmental relations; Rep. Thor Anderson (C-Minneapolis) talks about problems of the central cities

Thursday, February 25 - 4:45 p.m. - Legislative Report: University Research Dr. William F. Hueg, Assistant Director of the University's Agriculture Experiment Station tells of the value of agricultural research to the Minnesota economy

Friday, February 26 - 4:45 p.m. - Legislative Report: Higher Education Senator Robert Dunlap (C-Rochester) explains his approach to co-ordinating higher education in Minnesota

Monday, March 1 - 1:30 p.m. - Legislative Issues: Education, Taxes, etc. State Representatives William Frenzel (C-Golden Valley), Paul Overgaard (C-Albert Lea), Martin Sabo (DFL-Minneapolis), Stan Enebo (DFL-Minneapolis) answer questions from University of Minnesota students

Tuesday, March 2 - 1:30 p.m. - Legislative Issue: The Governor's Program Governor Karl F. Rolvaag discusses his legislative program with members of the Citizen's League of Minneapolis

Thursday, March 4 - 4:45 p.m. - Legislative Report: University Research Dean Paul V. Grambsch of the University School of Business Administration tells how the school's research contributes to the state economy and to Minnesota business

Friday, March 5 - 4:45 p.m. - Legislative Report: Higher Education Rep. Rod Searle (C-Waseca) explains his approach to co-ordinating higher education in Minnesota

Monday, March 8 - 1:30 p.m. - Legislative Process, Lecture #4 Dr. Charles Backstrom tells how a bill becomes a law in the legislature

Tuesday, March 9 - 1:30 p.m. - Legislative Issues Senator Robert Dunlap (C-Rochester) discusses legislative issues with members of the Citizen's League of Minneapolis

Thursday, March 11 - 1:30 p.m. - Legislative Issue: Reapportionment "The Rural-Urban Conflict and Reapportionment" is analyzed by Dr. Robert F. Berkhofer Jr., Assistant Professor of History and Dr. Charles Backstrom, Associate Professor of Political Science, both of the University of Minnesota

Thursday, March 11 - 4:45 p.m. - Legislative Report: University Extension Dean Willard Thompson of the University's General Extension Division tells how the University serves the state in a variety of ways

Monday, March 15 - 1:30 p.m. - Legislative Process, Lecture #5 Dr. Charles Backstrom describes the role of the chief legislator: how the Governor influences legislation

Tuesday, March 16 - 1:30 p.m. - Legislative Issues Rep. Fred Cina (DFL-Aurora) discusses legislative issues with members of the Citizen's League of Minneapolis

Thursday, March 18 - 1:30 p.m. - The Legislative Process: The Role of Caucuses and Parties in the legislature. Participants include House Speaker Lloyd Duxbury and Rep. D.D. Wozniak (DFL-St. Paul)

Monday, March 22 - 1:30 p.m. - Legislative Issue: The Prospects for New Taxes and Tax Relief. State Representatives Al France (C-Duluth), Salisbury Adams (C-Wayzata), D.D. Wozniak (DFL-St. Paul)

Tuesday, March 23 - 1:30 p.m. - State Senator William Dosland (C-Moorhead)

Monday, March 29 - 1:30 p.m. - The Legislative Process #6 (Final) Dr. Charles Backstrom, Associate Professor of Political Science, University of Minnesota

Tuesday, March 30 - 1:30 p.m. - Legislative Issue: Should We Place Any More Regulation on Lobbyists? Speakers: State Representate Representative William Frenzel (C-Golden Valley), Micheal Galvin, Lobbyist for Minnesota railroads

Monday, April 5 - 1:30 p.m. - Macalester College Political Emphasis Convocation.Minnesota Lt. Governor A.M. Keith, "The Future of Politics in Minnesota"

Tuesday, April 6 - 1:30 p.m. - Legislative Issue: State Institutions for Mentally Retarded. Speakers: State Representative Gary Flakne (C-Minneapolis), Melvin Heckt, President of Minnesota Association for Retarded Children

Friday, April 9 - 1:30 p.m. - Legislative Issue: The Dirksen Amendment Mr. Otto Christiansen, Minnesota Employers Association, Mr. Vern Bergstrom, Hennepin County League of Municipalities

Monday, April 12 - 1:30 p.m. - James Kimball, Minneapolis Tribune Columnist and former Minnesota Game and Fish Director, "Politics and You in Conservation"

Tuesday, April 13 - 1:30 p.m. - Legislative Issue: Metropolitan Problems State Representatives Howard Albertson (C-Stillwater), D.D. Wozniak (DFL-St. Paul) and State Senator Jerome Blatz (C-Bloomington)

Thursday, April 15 - 1:30 p.m. - Legislative Issue: Will We Ever Have Party Designation? State Representative Walter Klaus (C-Farmington) and State Senator Nicholas Coleman (DFL-St. Paul)

Friday, April 16 - 4:45 p.m. - Legislative Issue: The Liberty Amendment. Members of the League of Women Voters

Monday, April 19 - 1:30 p.m. - Legislative Issue: Does Our Tax Structure Need Adjustment or Overhaul? Speakers: State Senator Donald O. Wright (C-Minneapolis) and Dr. Stephen Quigley, Minnesota Commissioner of Administration

Tuesday, April 20 - 1:30 p.m. - Legislative Issue: Metropolitan Problems. Ted Kolderie, member of the Editorial Staff, Minneapolis Star and Tribune

Thursday, April 29 - 1:30 p.m. - The Governor's Power of Veto and Reapportionment, Professor John J. Cound, University of Minnesota Law School, St. Paul Attorney Jonathon H. Morgan

Friday, April 30 - 1:30 p.m. - Legislative Report: The Civil Administration Committee. State Representative Alpha Smaby (DFL-Minneapolis) and Representative Lyall Schwarzkopf (C-Minneapolis)

Tuesday, May 4 - 5:30 - 7:30 p.m.
Hearings of the Tax Committee of the Minnesota House of Representatives: Sales Tax Proponents

Thursday, May 6 - 5:30 - 7:30 p.m.
Hearings of the Tax Committee of the Minnesota House of Representatives: Sales Tax Opponents

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APPENDIX B

GROUPS AND ORGANIZATIONS WITH WHICH
KUOM COOPERATES DURING A TYPICAL YEAR

League of Women Voters of Minneapolis
League of Women Voters of St. Paul
Citizen's League of Minneapolis
Council of Metropolitan Area Leagues of the League of Women Voters
League of Women Voters of Minnesota (state organization)
Foreign Policy Association of Minnesota
United World Federalists
National Conference of Christians and Jews
National Jewish Fund
Wesley Foundation
United Theological Seminary, New Brighton
Hamline University
Macalester College
Augsburg College
American Civil Liberties Union, Minnesota Branch
Minneapolis Symphony Orchestra
Women's Association of the Minneapolis Symphony Orchestra
Minneapolis Civic Orchestra
St. Paul Philharmonic Orchestra
Schubert Club
New Friends of Chamber Music
National Council of the Metropolitan Opera
Minnesota Theatre Company, Tyrone Guthrie Theatre
Minnesota State Medical Association
League of Minnesota Municipalities
Minnesota Historical Society
Walker Art Center
Minneapolis Institute of Art
Minnesota State Department of Conservation
Minnesota State Department of Public Welfare
Minnesota State Department of Health
Minneapolis Public Schools
Minneapolis Public Library
St. Paul Public Library
German Department, Carleton College
Minnesota Education Association
Governor's Committee on Air Resources
Tuberculosis and Health Association of Hennepin County
Minnesota Congress of PTA's
Lutheran Education Office, Minnesota South District
Minnesota Catholic Education Association
Minnesota Elementary School Principals' Association
St. Paul Public Schools

APPENDIX C

EXCERPTS FROM TYPICAL LETTERS RECEIVED BY KUOM

I'm sure I voice thousands of people's appreciation for the beautiful music played on Saturday mornings... We don't take this fine program for granted, yet, in our busy homemaking days we probably enjoy the program without acknowledging. Thank you so much! (Mrs. A. Greenspan, Minneapolis)

Wotan is pleading with his stubborn wife at this moment (and what a Wotan is George London!). It's almost too difficult to write a proper letter of appreciation to KUOM for these Saturday afternoon programs of the Ring while they are being performed -- but I don't want to postpone telling you how very much they are enjoyed. I have been a Ring enthusiast since I was ten years old, which is nearly pre-World War I. Wagner has been "in" and "out" several times since then but somehow it takes more than Adolf to ruin such music... Again, many thanks for this music. Who needs to go to Bayreuth? (Winifred Netherly, Stillwater, Minnesota)

How many times I have been indebted to you for the 2:30 p.m. musical programs on KUOM!. As you are playing the Elliott Carter double concerto for piano and harpsichord at this moment, I'm reminded of a talk on Elliott Carter's music which I gave to the music section of the Women's Faculty Club at the University of Minnesota two or three years ago. Thank you again for your very devoted service to music. (Mrs. Mary A. Van Wagenen, Minneapolis)

All your comments on music are most interesting and I enjoy all your programs very much, especially "Ad Libitum" with your interviews. I'm also very happy to be on your mailing list and receive the KUOM program guide. Thank you very much for everything. (Mrs. S. Keifer, Burnsville, Minnesota)

I was unable to attend the concert at Northrop Auditorium this year which presented Charles Ives' Fourth Symphony. I was grateful for the opportunity to listen to this controversial work on KUOM. I appreciate very much the work and effort involved in recording and presenting these concerts on radio. Please continue them next summer. (A KUOM listener)

This is to express appreciation for the Wednesday evening concerts of the Minneapolis Symphony. The highlight of the series for me was the "Watts Concert." These concerts are very much appreciated for those of us who cannot afford to be there in person. Thank you. (M.I. Cornwall, Minneapolis)

We are overjoyed to have a really fine state station within earshot again. Were for years devotees of WHA in Madison, Wisconsin, then spent six years in the desert. Please send your program bulletin post haste. (Mrs. James G. Miller, Rochester)

Thank you for interviewing Dr. Edward Francel of the School of Social Work on Monday, March 14, to highlight National Social Workers Month. Station KUOM, with its large and special audience, has helped to publicize the need for more persons to enter the field of social work where a serious manpower shortage exists. This public service is sincerely appreciated. (Mildred Ptashne, Caseworker, Child Service Division, Hennepin County Welfare Department)

Monday, November 28, at 1:00 p.m. you reviewed books for Christmas giving. I was driving and unable to write down the titles. Is it possible to get a list? I was particularly interested in the four or five books on Russia for children. It was frustrating not to have access to paper and pencil. Thanks for your help. (Louise Rayner)

I am enjoying the historical novel you are reading at present on "Your Novel."

The Irish readings of the previous two or three weeks were delightful. Thank you. (Isabell Shoemaker, Minneapolis)

The Minneapolis Alumnae Chapter of Mu Phi Epsilon wishes to thank you for including our scholarship program in your list of events on your (Community Calendar) program Tuesday, October 18, 1966. We are sure that your cooperation helped to give us the good-sized audience that we had that evening.

Congratulations on your fine radio show, "Following Conservation Trails." I can't tell you how much I enjoy this splendid show. I think you are doing a fine job of bringing the true picture of Conservation to your radio audience. The authentic settings and good acting on the part of the cast tend to stimulate the mind and imagination so that one can almost see the characters they portray.... Again, I wish to thank you and bless you in your work. (Harold R. Snyder, St. Paul)

Congratulations on your "Current Events" program. I have just heard an analysis of the United Nations vote on China and the Supreme Court decision on the Communist Party. The presentation was very clear and impartial. I hope many hundreds of listeners heard it. (Mrs. Edward J. Stevens, Lake Elmo, Minn.)

Somewhere I read that there was thought of discontinuing the "Saturday" show. I add my voice to others to acclaim it as one of the best features of KUOM. Last week the dialogue with the Angola girl and the Mitau-Fraser discussion were very interesting. This is real creative radio and still informative. Keep it up. (Mrs. H.E. Wright, Minneapolis)

"Saturday" is the best program on the air in the Twin Cities -- radio or television. (Mrs. George Levin, St. Paul)

Here's one vote for continuation of "Saturday." At times, during the summer, I found myself bored with the content of the show. Ten minutes later, the items drew all my attention. I think you have an excellent program. (Tad Shaw, Minneapolis)

In honor of the ending of "Saturday," I have ordered all radios in the house to have black bands placed around them. Why do all good things last so short a time and bad things last so long? "Saturday" represents the highly discriminating and keen person with many resources. By all means, keep "Saturday." (W.W. Keenan, St. Paul)

A belated bravo and huzzah for your comments on the auto industry on the "Saturday" program of September 25. "Saturday" is a great show. Would that the sun shone longer or the FCC believed in the dark! Keep up the good work. (The Rev. Clyde J. Steckel, Minneapolis)

This is a long overdue note of appreciation for the many, many hours of fine listening your station has afforded me. The excellent reading of "Lost Horizons" was thoroughly enjoyed. Thanks to all who are connected with KUOM. (Mrs. Pat Lundgren, Minneapolis)

Much enjoyed "The Wind in the Willows" -- cool and soothing for these troubled times. Do you tape these readings? Some, like this present, should be preserved and made available to the blind. (Devoted listener, Minneapolis)

You did a splendid reading of "Wind in the Willows," which gave us many hours of pleasure. (Larry and Louise Schuster, Wayzata)

Last Saturday's "Essay on Cars" was fabulous, a classic! Your programs are the last few ones where I can hear good classical music and discussion of controversial subjects. Keep it up. (Gordon R. Coffin, Long Lake)

How I enjoy your programs, both on radio and TV. I have listened to "The Minnesota Theatre of the Air" all summer and enjoyed it. I hope it may be continued. (Dulcie Kees, St. Paul)

Though I was unable to hear all of the "Theatre of the Air" productions, the ones I did hear were enjoyable. As an avid listener to your station since moving to Minnesota in 1961, I especially appreciate the variety and scope of programs. Good music is available on FM, but little else. (Mrs. Rose Marie Cassidy, St. Joseph)

We do enjoy your programs. "Variety Music Hall" and "The Evening Concert" are part of my day. (Florence S. Rawland, St. Cloud)

Would it be possible to have a copy of Dr. Nichol's speech on "Public Affairs Forum" today? It was excellent and I would like to have my daughter, who is a University student, read it. Thank you. (Mrs. R. M. Canner, St. Paul)

The "To See Ourselves" series has been very fine. I just listened to the conversation between Dr. Tillich and Dr. Rogers. A blind friend of mine was also listening and is very anxious to get a tape or a record of the discussion. (Mrs. J. B. Corey, Minneapolis)

Do you have a printed program listing your regular offerings? I am particularly interested in securing one just now as I am setting up a bulletin board for our faculty and students to try to illustrate where they can find good radio or television listening or viewing. I have enjoyed you programs. (Mrs. Benita G. Smith, Associate Professor, Stout State University, Menomonie, Wisconsin)

Please repeat the program by Professor Goram on "Biology and the Future of Man" broadcast on "Public Affairs Forum." I found it fascinating but so startling I am sure I missed some of his points. For about ten years I have listened to "Public Affairs Forum" on KUOM and hope you will continue this type of broadcast forever. Thanks for continuing my education. (Mrs. Robert Day, St. Paul)

My husband and I both listen to most of the lectures given by KUOM and enjoy them immensely. You have also inspired me to make another try at "War and Peace," and I am even enjoying it this time. (Katherine Howard, Minneapolis)

A kudo to Robert Boyle for his topic selection and presentation of news. (W.W. Caldwell, Minneapolis)

These talks (by Dr. Donn Mosser on "Doctor, Tell Me") were superb. He did his job in an excellent and forthright manner. They presented to the attention of the listeners information that cannot be repeated too often. (Willard D. White, M.D., Minneapolis)

What a wonderful opportunity to be able to hear your classroom lectures on "The Geography of Minnesota." We look forward with real excitement to hearing what you have to say...an example of real scholarship and the

best teaching. We can't be grateful enough to you and to the University for this great privilege and pleasure. (Mildred W. Smith, Minneapolis)

We listen to all of the music programs from KUOM and WCAL. We think you have wonderful selections. (Alfred H. Davis, Albert Lea, Minnesota)

Words cannot express how much I enjoyed "The Messiah" last Saturday. I never miss this at Christmas or Easter. (Mrs. George Parent, Rice Lake, Wisconsin)

May I take this opportunity to thank you for the wonderful music you are broadcasting, which otherwise music lovers wouldn't have a chance to hear -- especially the contemporary music. (Oscar Slaton, Minneapolis)

Thank you for the unusual music you are presenting on this program ("Ad Libitum"). (Mrs. J. R. Chipault, Austin)

I just want to let you know that I enjoyed your program on serial music. I'm afraid that I still cannot appreciate this style of music, but your explanation helped clarify many questions which I had. I sincerely hope "Ad Libitum" will continue on KUOM. It provides a much-needed community service. (John Erickson, Minneapolis)

Minnesota

SAINT JOHN'S UNIVERSITY

COLLEGEVILLE, MINNESOTA 56321

DIRECTOR OF BROADCASTING

RECEIVED
JAN
9
1967
NATL EDUCATIONAL RADIO

January 6, 1967

Mr. Jerald Sandler
Director of National Educational Radio
1346 Connecticut Avenue N.W.
Washington, D.C. 20036

Dear Jerry:

Enclosed are copies of our comments concerning the FCC's inquiry into educational broadcasting.

Please keep us informed of any future developments concerning state networks or federal aid to educational radio.

Sincerely,

William H. Kling
Director of Broadcasting

WHK:db
encl.

December 28, 1966

Mr. Ben F. Waple
Secretary
Federal Communications Commission
Washington, D.C.

Re: Docket No. 14185

Dear Mr. Waple:

Regarding paragraph four of your notice of inquiry concerning the revision of FM broadcast rules for the educational channels, we would like to make the following comments.

The order of St. Benedict Inc. (St. John's University) has submitted on application for channel 216 in New Brighton, Minnesota for a new educational FM station exceeding the class "A" limitations. Should this application be granted, future plans call for an increase in power until 50 kw horizontal and vertical is reached.

This station is to be operated as part of educational FM network and will be fed by KSJR-FM in Collegeville, Minnesota. The plan of operation was designed by Jansky and Bailey of Washington and is similar to those now operating between WGBH-FM and WFCR-FM in Massachusetts and also WUOM and WVGR-FM in Michigan.

In order for this on-the-air relay system to operate properly a minimum of five channels of separation between the frequencies of the two stations is necessary.

In July of this year, we filed an application for Channel 219 in New Brighton, Minnesota however, between the time the application was begun and submitted, another application was filed leaving us with short spacing.

At the suggestion of the FCC in a letter dated September 29, 1966 #8720, "It is therefore suggested that the application be resubmitted to specify another channel, 216 or below," the application was re-submitted, specifying that channel.

A channel search indicated that there are no other acceptable channels that would allow proper operation of the relay system between Collegeville and New Brighton.

For these reasons we would like to ask the FCC to classify channel 216 in Minneapolis-St. Paul as a Class "C".

It is our suggestion that because of the wide dispersion of 10 watt stations now occupying the spectrum of the educational band, that the FCC consider the allocation of class "A" channels on a city by city basis when the allocation table is drawn up. It should then be possible to insert the necessary "A" channels, alloting them to 10 watt and other stations presently beneath the "A" technical ceiling.

It is our opinion that it would be most undesirable to limit existing educational FM stations of power greater than 10 watts to the ceilings of Class "A" stations when there is an alternative unused or 10 watt channel in the same city that could just as well be so limited.

With regard to a power and height ceiling for educational stations we would again urge the FCC to limit the educational channel only where necessary for the protection of Canadian FM stations. We do agree, however, that the milage separation for class "C" commercial stations be adopted for the educational band.

KSJR-FM, presently under construction permit of 37,000 watts, may in the future be the feed station for a network of educational stations in Minnesota. If this were tobe the case, it would be desirable to increase both vertical and horizontal power to a level which would allow on- the-air network operation. It is possible that the required power would be in excess of 100kw and 2000 feet and therefore undesirable and not necessarily in the public interest to have that as a maximum ceiling.

Therefore we would like to encourage the FCC to limit only those stations that might possibly cause Canadian interference, as they have done in the past with channels 218, 219, and 220 in protecting the commercial band.

In summary, we specifically request that channel 216 in New Brighton, Minnesota be delegated a "Class C" channel; that all Class "A" channels be allocated according to the possibilities of each city and that class "C" channels be limited in power and height only where necessary for interference protection of Canadian stations.

Sincerely,

William H. Kling
Director of Broadcasting

WHK:ko

Mr. Ben F. Waple
Secretary
Federal Connumications Commission
Washington, D. C. 20554

Re: Docket No. 14185

December 23, 1966

Dear Mr. Waple:

In response to the FCC notice of inquiry concerning the revision of FM broadcast rules particularly as to the allocation and technical standards of the educational FM channels, we would like to make the following comments.

For the past several months the Minnesota Private Colleges have been concerned with the need for a non-commercial educational FM radio service for the State. We feel that the demands of our contemporary society require educational institutions to be more than storehouses of accumulated knowledge; that today's university must function actively as a contributing member of the society that sustains it, sharing its resources and experience with the community generally.

Realizing that every community is made up of all sorts of people with all sorts of tastes, special abilities, gifts and special interests, a second broadcasting service is essential. Where the traditional media of communication are concerned, the needs and desires of dissimilar audiences have always been recognized. Many books and periodicals are published in the knowledge that they will appeal only to a small specially gifted and specially educated minority. Yet in the field of commercial broadcasting, this is rarely the case. The nature of the commercial enterprise seems to necessitate an appeal to a mass audience and therefore it is almost impossible to make adequate provision for limited and exceptional audiences.

For these reasons the Minnesota Private Colleges have indorsed a plan to establish a state network of FM radio stations. This plan calls for class "C" stations in the following areas:

Duluth
Moorhead
Collegeville -- KSJR -- 90.1 mc

Minneapolis-St. Paul
Winona
Northfield
St. Peter
Pipestone, Minnesota

Thus far formal applications for stations in Collegeville and Minneapolis-St. Paul have been accepted for filing by the FCC on behalf of St. John's University, a member of the Minnesota Private College Council. The Collegeville application has been granted a construction permit and call letters KSJR-FM. Should the FCC grant the application for a station in Minneapolis-St. Paul the first link of this proposed network will be established.

In addition, the College of St. Benedict has recently been connected by telephone line to the KSJR studios, thus completing the first inter-college connection. The third link would be the re-activation of WCAL-FM at the College of St. Olaf, a class "C" station which has been silent for fifteen years.

If licenses for stations in the above listed communities were granted by the FCC, the other private colleges would then be interconnected to the studios of the nearest transmitter, allowing any college to feed the network, through a coordinating center, and yet leaving provision for individual stations to broadcast a locally originated program of local interest, separately from the network.

Programming will be appropriate to the liberal arts nature of the private college. The emphasis will be on cultural, fine arts, public affairs, general education and religious programming. It is intended also to offer timely and informative national and international news and commentary on public issues, applying these issues to and indicating their significance to the local broadcast area. Existing relationships established between KSJR and the Eastern Educational Network will enable it and proposed additional network stations to benefit by even greater diversification of viewpoint and philosophy. This mechanism will not only help to generate more and better programs, but will allow for a more equal distribution of the country's resources.

In addition we propose to use the 67 kc subcarrier for multiplex broadcasts to specialized audiences such as doctors, lawyers, and local government leaders as well as classroom instruction for elementary and secondary schools. We propose

reserving the 38 kc subcarrier for use in stereophonic broadcasting in order to be able to present programming, particularly musical programs, in the best possible and most attractive manner.

We feel that the educational resources and the academic and religious freedom afforded the private college could provide an unparalleled service to the audiences of the state.

Respectfully Submitted,

William H. Kling
Secretary
Minnesota Private Colleges
Radio Network

Augsburg College
Mr. Kenneth Fagerlie
Gustavus Adolphus College
Mr. Robert Butler
Hamline University
Mr. Lawrence Anderson
St. Benedict's College
Mr. Cliff Sakry
St. John's University
Mr. William Kling
St. Mary's College
Bro. Albert F.S.C.
St. Olaf College
Mr. Milford Jensen
St. Theresa's College
Mr. Karl Lipsohn
St. Thomas College
Mr. Harry Webb

WHK:ko

NEVADA

UNIVERSITY OF NEVADA
RENO, NEVADA

AUDIO VISUAL
COMMUNICATION CENTER

February 21, 1967

National Educational Radio
1346 Connecticut Avenue, N. W.
Washington, D. C. 20036

Re: Docket No. 20554

Dear Sir:

Enclosed is a copy of our letter to the Federal Communications Commission regarding Docket No. 20554.

I regret that this letter has been so late; but due to the lack of time at the end of December, this letter never got written. Your latest newsletter stated that these letters could still be written due to postponement of deadline.

I hope this one letter will make some small impression in the decision by the Federal Communications Commission.

Sincerely,

Wendell H. Dodds

Wendell H. Dodds
Manager, KUNR-FM

UNIVERSITY OF NEVADA
RENO, NEVADA

AUDIO VISUAL
COMMUNICATION CENTER

February 20, 1967

TO: Secretary
Federal Communications Commission
Washington, D. C. 20554

FROM: Radio Statio KUNR-FM
University of Nevada
Reno, Nevada 89502

RE: FCC Notice of Inquiry
Re: Docket No. 14185

Radio Station KUNR-FM deems that any increase in power would be a needless additional expenditure.

Radio Station KUNR-FM is a 10-watt, non-commercial educational station, operating with funds for operation and maintenance furnished by the University of Nevada, State of Nevada. The station operates with a two-fold purpose:

1) to provide practical training in speech, writing and announcing for students at the University of Nevada.

2) to broadcast programs about the University of Nevada, its activities, educational programs, and especially selected music for listeners throughout the Reno-Sparks area.. a 12-mile radius.

KUNR-FM broadcasts a variety of programs, as follows:

1) Music programs include classical music programs designed to form a unity of subject within each program...not merely a rambling of musical selections. Programs of more popular music are designed to acquaint listeners with the various forms of music and to allow the students to create and present informational broadcasts about these forms of music.

2) As a member of the National Educational Radio and the Intercollegiate Broadcasting System, KUNR-FM is able to present educational and informational programs that have been produced on a professional level. Educational and classroom lectures are also obtained from the University of Colorado and Washington State University.

3) Since the University of Nevada is non-denominational, religious programming consists of general religious programs made available to the station through various national organizations.

4) Public affairs programs are constantly requested; and such local programs as the Political Science Department's program introducing political candidates during the recent elections, the University's guests, lecturers and events are recorded and presented on the station.

5) Throughout every broadcast day, frequent announcements are given to public service organizations on the campus and throughout the Reno-Sparks area.

Most of the above programs are not available on the other two FM stations in the Reno-Sparks area. One station maintains a format of popular music. The second station provides a varied format that ranges from the popular to the classical...but there is no attempt to program for a specific audience; while this station does furnish news and editorial programming, they broadcast only a small fraction of any type of informational or educational programming, if any. KUNR-FM furnishes a programming that would not be economically feasible or practical to the other FM stations in this area.

The 10 watts of power under which the station operates is thoroughly adequate. The geographical position of the University of Nevada permits this power to reach throughout the Reno-Sparks area. The population outside this area is minimal and too distant. Increase in power would not permit the station's signal to get out of the basin, which is surrounded by a mountainous terrain.

UNIVERSITY OF NEVADA
RENO, NEVADA

AUDIO VISUAL
COMMUNICATION CENTER

At the present time, KUNR-FM with 10 watts of power is operating efficiently, furnishing proper training for students, and broadcasting clearly throughout the Reno-Sparks area. Any increase in power would not change any of these factors, but would only require a needless additional expenditure.

Wendell H. Dodds

Wendell H. Dodds, Manager
KUNR-FM

UNIVERSITY OF NEVADA
RENO, NEVADA

AUDIO VISUAL
COMMUNICATION CENTER

February 20, 1967

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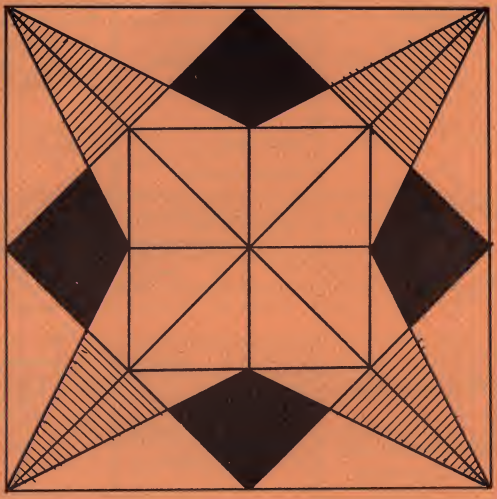
Wendell H. Dodds, Manager
KUNR-FM



KUNR-FM

FEBRUARY, 1967

KUNR-FM PROGRAM GUIDE

88.1 megacycles — **February, 1967**

	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SUNDAY	
4:00	MOSAIC BROADWAY 2/6 - Hello Dolly! 2/13- The Girl Who Came To Supper 2/20- Mr. President 2/27- Half A Sixpence	MOSAIC JAZZ 2/7 - Kenny Burrell 2/14- Maynard Ferguson 2/21- Quincy Jones 2/28- Denny Zeitlin	MOSAIC AMERICANA 2/1 - Woody Guthrie 2/8 - Back Porch Majority 2/15- Glenn Yarbrough 2/22- Women Folk	MOSAIC FOLK with Nick Cady 2/2 - Brazil 2/9 - Basque Country 2/15- Czechoslovakia 2/23- India	MOSAIC POPULAR	YOUR SUNDAY PLEASURE	2:00
5:00	DOORWAY TO THE FUTURE	SPACE STORY	HISTORY OF SPACE	VISTA	TODAY'S CHALLENGE		
5:15		LITERARY SCRAPBOOK					
5:30	PRIMITIVE MUSIC	MUSICAL MASTERPIECES produced by the University of Colorado	THE WORLD IN 20 YEARS	COMMUNICATE	SCIENCE IN THE NEWS	THE WORLD OF SOUND	3:30
5:45			SERENADE IN GREEN		KUNR-FM COMMENTS		
6:00	U N I V E R S I T Y O N T H E A I R presented by the Department of Journalism						
6:05	M U S I C F O R Y O U R D I N I N G P L E A S U R E - without interruption						
6:55	K U N R - F M N E W S C A P S U L E presented by the Department of Journalism						
7:00	COLLEGE AUTHOR'S FORUM	ENCORE 2/7 - Eileen Farrell 2/14- Montserrat Caballe 2/21- Alexander Brailowsky 2/28- Leontyne Price	MUSIC IN THREE-QUARTER TIME	LEGENDARY PIANISTS Great piano performances by the world's greatest piano artists.	THE WORLD OF THE BALLET 2/3 - Gaite Parisienne 2/10- Le Sacre du Printemps 2/17- Billy The Kid 2/24- Les Patineurs	NETHERLANDS COMPOSERS Produced by Radio Netherlands	5:30
7:15	YOUNG CONTEMPORARY POETS with Richard Morris						
7:30	MUSIC OF THE MASTERS 2/6 - Virtuoso Piano 2/13- European Contemporary Works 2/20- Schoenberg 2/27- Stravinsky Ballet	SHAKESPEAREAN THEATRE with introduction by Dr. David W. Hettich 2/7 - Henry IV, part I 2/14- Henry IV, Part II 2/21- Richard II 2/28- A Midsummer Night's Dream	KUNR-FM GOES TO THE OPERA 2/1 - Boris Godounov 2/8 - The Elixir of Love 2/15- Porgy and Bess 2/22- La Boheme	SPECIAL TONIGHT! 2/2 - Dolmetsch-Schoenfeld Ensemble 2/9 - "Organized Crime" by Professor Cressey 2/16- Music from the Soviet Republics 2/23- "The Gondoliers" Gilbert & Sullivan	FIRST NIGHTER 2/3 - Ivanov 2/10- Death of a Salesman 2/17- The Glass Menagerie 2/24- The Importance of Being Earnest	MUSIC OF THE MASTERS 2/5 - Classical Symphony 2/12- Post Romantic Contemporary Concert Vocal 2/19- Tchaikovsky 2/26- Contemporary Concertos	6:00
10:00	M U S I C F O R E A S Y L I S T E N I N G					MAGIC MOMENTS IN THE AMERICAN MUSICAL THEATRE Colorful music tracing the development of the American Musical Theatre, featuring performers who made them great.	8:00
10:55	K U N R - F M N E W S C A P S U L E presented by the Department of Journalism						

KUNR-FM PROGRAM GUIDE
February, 1967
Vol. 1 No. 2

MUSIC OF THE MASTERS

Program

Monday

2/6 - Rubinstein at Carnegie
Richter at Carnegie

2/13- HINDEMITH:
Concert Music for Strings and Brass
Symphonic Metamorphosis
Mathis der Maler
BARTOK:
Music for Strings, Percussion, Celesta
Concerto for Orchestra
Concerto for Piano

2/20- SCHOENBERG:
Chamber Symphony No. 1
Chamber Symphony No. 2
Kol Nidre
Transfigured Night
Variations for Orchestra
Pelleas und Melisande

2/27- STRAVINSKY:
The Firebird
Petrouchka
Sacre du Printemps
Jeu de Cartes
Scenes de Ballet

Sunday

2/5 - HAYDN:
Symphony No. 86
Symphony No. 100
Symphony No. 101
Symphony No. 95
MOZART:
Symphony No. 30
Symphony No. 31

2/12- MAHLER:
Das Lied von den Erde
BRAHMS:
Alto Rhapsody
Song of Destiny
BRITTEN:
Songs from the Chinese Folk Songs

2/19- TCHAIKOVSKY:
Symphony No. 5
Symphony No. 6
Concerto No. 1

2/26- COPLAND:
Clarinet Concerto
Piano Concerto
PROKOFIEV:
Symphonic Concerto for Cello and Orchestra
SHOSTAKOVICH:
Piano Concerto No. 1
POULENC:
Concerto for 2 Pianos
BRUCK:
Violin Concerto
BARBER:
Piano Concerto

WUNH-FM
90.3 MCS.

MEMORIAL UNION • UNIVERSITY OF NEW HAMPSHIRE
DURHAM, NEW HAMPSHIRE

RECEIVED
JAN 23 1967
NATL EDUCATIONAL RADIO

January 16, 1967

National Educational Radio
1346 Connecticut Avenue, N.W.
Washington, D. C. 20036

Dear Sirs:

First, I would like to apologize for sending in this questionnaire a few days late. It is very important to us since we plan to expand, and I wanted to try to give you full and complete answers.

As you probably know, the F.C.C. issued Docket # 14185 in November, and since then WUNH-FM has made plans to expand to ten kilowatts, hopefully by 1969. The major stumbling block to realizing our goal is money. At the present time there are no federal funds available (I infer this from your questionnaire.); the University can not afford the expense of our expansion; and it appears that we will have to tax the students to get the necessary $45 - 50,000 for the initial investment.

Federal funds support educational television, and it is my opinion that they should also support educational radio. If the F.C.C. can issue Docket # 14185 proposing the abolishment of all ten watt educational FM stations and the establishment of high power stations in their place, then certainly the government should help these smaller stations go high power. The government can not expect to crush these small stations in hopes that larger ones will take their places without some sort of monetary assistance.

When it comes to University funds, there are none for educational radio. The University is already supporting an educational television station. It has started an expansion plan that will end in 1972 with a second plan being drawn up at the present time. The University realizes the value of a radio station, but there is only so much money in the budget, and we do not have a very high priority.

All of this leads up to an increase in the student activity tax. As we see it, this is the only way to get the amount of funds necessary for the expansion of WUNH. Whether or not we will be allowed to take this course of action is another matter. It means raising some sixty-five (65) thousand dollars in two years, and at least twenty (20) thousand every year thereafter for our annual budget. The problems of funds are not simple ones.

MEMBER OF

WUNH-FM will have an excellent opportunity to serve New Hampshire and the New England area within the next few years. Construction will soon start on the Kellogg Center, also known as the New England Center for Continuing Education. This center is being financed by, and is a joint project of all six New England states. The Center will provide vast programming material for the Eastern Educational Radio Network. It is hoped that N.A.T.O. will hold conferences there and that many world-renowned people will visit and speak there. It will create an opportunity to supply education to the people of New Hampshire, New England, and the Eastern United States, not through classrooms, but through the media of radio and television. Opportunity is at our doorstep, and it must not be allowed to slip through our fingers for lack of funds.

For years, WGBH-FM from Cambridge, Massachusetts has begged the University of New Hampshire to increase the output of its FM station. WGBH, being the mother station for the E.E.R.N., made plans many years ago for an educational radio network to run from Maine to the Carolinas. We failed to fulfill our part of the plan for lack of funds. Instead of a five to ten kilowatt station, we built a ten watt station. We are the void between Boston and Orono, and now we want to fill that void, but we need help.

Vast resources are at our fingertips. Men who are experts on China, Latin America, South East Asia, economics, physics, and geology are here. Poets, authors, and musicians visit here and read or perform their masterpieces here. Senators and foreign ambassadors lecture here. University scientists have launched satellites. University professors have traveled all over the world for the United States State Department. This knowledge and talent is sitting here waiting to be tapped and delivered to the millions of people who are not in college, who are not able to come and listen to this store of talent. These resources are not being used in their full potential - far from it, to be exact.

We have so much to offer the people of our state and the New England area, but no way of delivering it. WUNH is not the only ten watt station with plans and potential; others undoubtedly need government aid just as we do. I have stated what we can offer you and our audience, and I now ask what you can offer us. Will we be able to receive monetary assistance from the government?

The need has been established, and being a student, there is little more I can do about the situation. You have the ball now, but if I can assist you in any way please let me know.

Sincerely,

Stephen H. Thompson

Stephen H. Thompson
General Manager

SHT/cw
encl.

NEW York

SYRACUSE UNIVERSITY SYRACUSE, NEW YORK 13210

WAER • 88.3 MCS

Affiliate Station of the Educational Radio Network
and the National Association of Educational Broadcasters

December 12, 1966

Mr. Jerrold Sandler, Executive Director
National Educational Radio
1346 Connecticut Avenue, N. W.
Washington, D. C. 20036

Dear Mr. Sandler:

Thank you very much for your recent letter and all the helpful enclosures which pertained directly to my study of educational FM radio. The materials were useful to me in organizing background information on the exciting new developments in this field. My immediate objective was to organize the information into a 17-page term paper for a graduate course, "Television-Radio in Education," which I am taking in my Ph.D. program. I then summarized about the last half of the paper and submitted my own comments to the FCC in response to that agency's recent Notice of Inquiry. A copy of this is enclosed.

I have every interest in carrying this inquiry further -- possibly to the extent of sitting down with somebody here in New York state and in other states and drawing up our specific statewide allocations tables for educational FM. I plan to contact Mr. King and Dr. Cooper in the near future. I would hope that the method of assigning channels would proceed according to my "Priorities" (see pp. 5-6), with special attention given to assigning channels to towns containing colleges and universities not now operating FM stations.

While some of my recommendations -- which are mine alone and not Syracuse University's -- may appear a bit harsh for educational FM, I feel that only by tightened standards imposed by government does this portion of the broadcast spectrum stand any prospect of reaching its potential. That's why I'm so willing to go along with the FCC's idea that 10-watters are a waste of spectrum space; why I feel that educational FM's should maintain a minimum 36-hour weekly schedule; that daytime school-board-licensed stations do not serve the public interest.

It is encouraging to note that, with your efforts, educational radio may be included in the ETV Facilities Act. I'd be glad to supply any information or ideas for which you might anticipate a need. One thing I did for my report was to draw on a large map of the United States the land-area coverage of the 315 educational FM stations, using the 50 uv/m contours of all except the 10-watters (which were only underlined). If such documents are not otherwise available, I could probably send you my copy.

It will be a pleasure to hear from you regarding the progress you achieve on behalf of educational FM, and I'll pledge my assistance at this end.

Sincerely,

Bruce F. Elving

Bruce F. Elving
WAER Manager

[illegible]
and manager of [illegible]

December 7, 1966

The comments set forth here deal with most of the issues mentioned in the recent FCC Notice of Inquiry in the matter of revision of FM broadcast rules in regard to educational FM. In addition, certain other matters not specifically alluded to in the present Notice are briefly discussed.

The writer's interest in these matters stems from the original Notice of Inquiry of July 5, 1961, which elicited from this source, on September 19, 1961, some fairly specific "Comments. . ." concerning the upcoming needs, as I perceived them, for both commercial and educational FM. At least one of my 1961 suggestions -- that Class A commercial stations' maximum facilities be increased from 1 kw to 3 kw was apparently accepted.

Certain of the conclusions discussed here in regard to educational FM are identical to those propounded five years earlier; in other areas, I have modified my views somewhat; a majority of the matters, however, are relevant only to the present discussion and are given as full a consideration as possible before making any recommendations.

THE PROBLEM

The development of educational FM radio in the United States has been anything but orderly. Stations of extremely low power and operating short, sometimes sporadic schedules with seemingly little sense of destiny have found their way onto the 88 to 92 megacycles' portion of the spectrum in a haphazard geographical configuration. A map showing the 50 uv/m contours of the 315 presently authorized educational FM stations would reveal large land areas and population centers unserved by even a single station. Such important states as New York and Pennsylvania, compared to the upper midwest, are comparatively unserved. FM educational service in the South is spotty, with Alabama's WUOA reportedly "temporarily off the air"; and the mountain and plains states are similarly underserved. Such large markets as New Orleans, Spokane, Erie, Omaha, Denver, Fresno, Savannah and the two Charlestons are without educational FM service.

Only one state, Wisconsin, has a complete educational FM network, although Pennsylvania and Iowa are known to have plans, and it is this writer's intention to work with groups in New York to submit a detailed plan for a New York state educational FM network.

Despite these problems, educational FM channels are attracting new stations at an increasing rate. According to Jerrold Sandler, executive director of National Educational Radio, writing in late 1966, ~~mentioned that~~ some 20 percent of all educational radio licensees have gone on the air during the past two years. The rise in educational FM assignments since 1956 is indicated in Table I, along with comparable commercial FM data.

TABLE I
THE EVOLUTION OF FM RADIO, 1956 TO 1966

	1956		1960			1966		
	Total	Per Channel	Total	Per Channel	% Incr.*	Total	Per Channel	% Incr.**
Educational stations:	136	6.7	166	8.3	22.0	315	15.5	89.8
Commercial stations:	546	6.8	801	10.0	46.7	1808	22.6	126.0

*over 1956 **over 1960

The need for an FM table of assignments, such as the FCC proposes for the noncommercial, educational portion of the FM band, is immediately apparent from a glance at Table I, from which it may be noted that, while the overall rate of occupancy per channel has risen more sharpely for the commercial as opposed to the noncommercial sector, it may be inferred that the more recent rate of commercial increase is proportionately less than that for educational FM, as a look at the percentage changes appearing with the last two sets of data will reveal.

While the rate of increase for commercial FM was double that of educational FM up to 1960, its pace by 1966 was only one-third greater. As the commercial assignment table nears a point of saturation, the rate of commercial FM growth will undoubtedly taper off, with possible future growth in FM likely to be confined to the last source of available channels -- educational FM.

TWO CLASSES OF EDUCATIONAL FM STATIONS

The FCC's proposal to extend to noncommercial FM the same standards as for commercial FM in regard to classes of stations, powers and antenna heights and minimum station and assignment separations appears to this observer to be entirely valid. The wisdom of maintaining the exact ratio of one Class A channel for four Class B/C channels (as is the case with commercial FM) may be questioned in view of the fact that 269, or 66 per cent, of the 315 educational FM stations are operating with Class A facilities (I [illegible] have access terrain or [illegible]. This would compare with the 1960 figure of [illegible] commercial Class A stations, or 18 per cent of the total of 801, when one-fourth of that band's channels were [illegible] as Class A. These figures indicate that it is the lower power facilities [illegible] most favored by educational organizations; hence, a greater proportional access to them should be provided. My specific recommendation is to agree with the FCC proposal to make Channels 201, 204, 206, 208 and 216 Class A, with the remainder becoming B/C. In addition, I would recommend that another channel, such as No. 213 (90.5 mc.), with but two higher-power authorizations, be added to the Class A list. If possible, the seven affected stations should change frequencies to a B/C channel; similarly, those stations of lower power that do not wish to or are unable to qualify for the higher-power reservation should move to Class A frequencies. At this point, it should be mentioned that, according to the writer's own records, there are only five stations operating with more than the Class A maxima on the five original affected frequencies, as opposed to the FCC's estimate of "about eight."

THE COLLEGE AND UNIVERSITY STATION

In the reservation of specific educational FM channels, a special case can be made in favor of the college-university-licensed station. By my calculation, fully 68.5 percent of the authorized EFM stations, or 216, are licensed or soon to be licensed to four-year colleges and universities, whereas the remainder are licensed to a variety of groups or institutions, ranging from the Texas Trade School (licensee of chronically silent KVTT Dallas) to the Nashville Public Library, including not a few stations licensed to boards of education, high schools, state agencies and other nonprofit organizations.

By consulting Table II, it will be noted that the extent of collegiate-controlled broadcasting varies widely from state to state. Since the table indicates, in the final column, the large number of institutions not yet having FM according to the various states, we can expect the pressure from this source for more FM licenses to continue at the present rate of increase. (Information concerning the locations of colleges and universities in Table II is from James Cass and Max Birnbaum, Comparative Guide to American Colleges -- New York: Harper & Row -- 1965.)

Inasmuch as the college-university area accounts for more than two-thirds of all educational FM authorizations, it is imperative that, for this development to continue, specific channel assignments be made wherever possible in communities containing colleges without FM stations. We would then expect the states awarded the highest number of new educational reservations to be the ones with (a) a low percentage of institutions presently having FM, (b) a high number of institutions without FM, and (c) a large land area.

Excluding the states with fewer than six institutions of higher learning, it will be noted that FM saturation at the colleges and universities, on an individual state basis, is invariably less than 50 per cent. In the more populous states, the percentage tends to drop, with New York having more institutions (78) without radio than any other state. As a guideline, the examples of such large states as Indiana and Ohio, with 42.9 and 35.9 percent saturation respectively, should be expected across the country as educational FM matures.

NOTE: Table II appears on page 4.

TEN WATT OPERATION AND THE PUBLIC INTEREST

Currently, according to the FCC, about 45 percent of all educational FM stations are limited coverage, 10-watt operations. Many of today's higher powered stations actually began as 10-watters, but having found that 10 watts was not adequate, increased their power. This was particularly true in larger urban centers, such as Duluth-Superior, where both former 10-watters have since upped their powers; however, the trend is apparent as well in the small towns where 10-watt operation was originally thought to be sufficient, as was the case in Greencastle, Ind. (John Guy, "Nation's First 10-Watter Increases Power," NAEB Journal, Sept.-Oct. 1963).

The writer agrees with the FCC-expressed premise that "operati. . with such limited power does not usually represent an efficient use of scarce spectrum space, since coverage is often limited to a few miles." This is in conformity with my September 19, 1961 contention that the power maximum of the Class D educational station should be raised from 10 watts to the equivalent of the

TABLE II

THE DISTRIBUTION OF COLLEGES, UNIVERSITIES AND COLLEGE EFM STATIONS

State	Total EFM Stations	Non-College EFM's	College-Univ. EFM's	No. Colleges, Univ.	% Col., U. w/EFM	No. Col-U. w/out EFM
Alabama	2		2	20	10.0	18
Alaska	1		1	1	100.0	0
Arizona	1		1	3	33.3	2
Arkansas	2		2	15	13.6	13
California	27	12	15	75	20.0	60
Colorado	4	1	3	15	20.0	12
Connecticut	5		5	17	29.4	12
Delaware	0			2	0.0	2
District of Columbia	2		2	11	18.3	9
Florida	5	1	4	13	30.8	9
Georgia	1	1		25	0.0	25
Hawaii	1	1		3	0.0	3
Idaho	4	2	2	4	50.0	2
Illinois	19	7	12	49	24.5	37
Indiana	23	11	12	28	42.9	16
Iowa	7	1	6	27	22.2	21
Kansas	6	1	5	22	22.7	17
Kentucky	5	2	3	20	15.0	17
Louisiana	1		1	19	5.3	18
Maine	3		3	8	24.0	5
Maryland	2	1	1	24	4.2	23
Massachusetts	13	3	10	52	19.3	42
Michigan	15	7	8	30	26.6	24
Minnesota	3		3	25	12.0	22
Mississippi	0			13	0.0	13
Missouri	8	3	5	34	14.7	29
Montana	1		1	9	11.1	8
Nebraska	0			16	0.0	16
Nevada	1		1	1	100.0	0
New Hampshire	2	1	1	7	14.3	6
New Jersey	7	2	5	22	22.8	17
New Mexico	4	1	3	7	42.8	4
New York	25	8	17	95	17.9	78
North Carolina	6	1	5	33	15.2	28
North Dakota	1		1	7	14.3	6
Ohio	23	4	19	53	35.9	34
Oklahoma	4	2	2	16	12.5	14
Oregon	6	4	2	18	11.1	16
Pennsylvania	14	3	11	85	13.1	73
Puerto Rico	1	1		4	0.0	4
Rhode Island	2	1	1	8	12.5	7
South Carolina	2		2	19	10.5	17
South Dakota	1		1	13	7.7	12
Tennessee	6	2	4	32	12.5	28
Texas	11	2	9	46	19.6	37
Utah	4		4	5	80.0	1
Vermont	1		1	9	11.1	8
Virginia	7	2	5	28	17.9	23
Washington	6	2	4	16	25.0	12
West Virginia	2		2	17	11.8	15
Wisconsin	17	9	8	29	27.6	21
Wyoming	1		1	1	100.0	0
Totals	315	99	216			
Percentages	100.0%	31.5%	68.5%			

Class A commercial station. The proposals made relative to a freezo on new 10-watt stations, and the requirement that existing 10-watt stations be given until the end of their license period before having to seek an increase in power or face the prospect of deletion, especially if another applicant proposes a mutually-exclusive operation with a power above the minimum for the class of channel upon which the station would operate, are valid. My suggestion is to allow continued operation of 10-watt transmitters as translators to extend the coverage of regularly-licensed EFM stations -- translators that would be unattended and exempt from the station identification rule.

In order to offset the burden placed upon new or existing applicants in meeting the new minima for the class of channel upon which they would operate, I would propose a relaxation of the rule requiring daily transmitter inspection by a First Class engineer for stations up to 3 kw ERP, and to allow students operating these facilities to use a restricted operator permit rather than a [illegible] Class broadcast-endorsed license. A major problem facing college stations is in arranging for groups of students to make trips to an FCC district office [illegible] during a school year, and to wind up with 50 or more FCC licenses [illegible] plastered on the walls and windows of the radio station's control room!

TV CHANNEL SIX INTERFERENCE

Concerning the possible problem of interference to TV Channel 6, which was alluded to in the FCC notice, it appears that by keeping Channel 201 (88.1 Mcs.) a Class A channel, much of the potential problem is immediately resolved. With TV stations generally operating with higher power and antenna heights than was the case in 1961, the "problem" of interference to this service from educational FM may be more hypothetical than real. If there is a problem, it is more likely to be one of high-powered TV interfering with lower-powered educational FM reception. With development in the commercial FM band being as intensive as it now is, consideration should, in fact, be given to returning such educational FM outlets as WFBE Flint, WMUK Kalamazoo, WFIU Bloomington, and KUOW Seattle to the educational portion of the band to which they belong. This is vital, for by definition, commercial broadcasters are barred from the educational part of the band, while an educational station is seemingly at liberty to invade the commercial FM band. The possibility exists that television operators may actually encourage the removal of educational FM services to the commercial channels in an effort to reduce or eliminate competition in the selling of air-time.

PRIORITIES IN ASSIGNING CHANNELS

In anticipation of the future needs of the educational FM service, the following guidelines in the assigning (and subsequent granting) of channels are suggested:

1. Statewide or regional organizations for the purpose of developing networks, utilizing high-powered stations capable of off-air relay -- relying mainly upon Class B/C channels.

2. Colleges and universities, both now and in the future, the most likely source of further educational FM growth -- Class A assignments and Class B/C channels unused under "1".

3. Public School Systems. The development of separate stations solely devoted to daytime in-school instruction, however, should be discouraged as a waste of valuable public frequencies. Intensive utilization of SCA multiplex techniques on existing or proposed educational or even commercial FM stations can instead supplant such non-broadcast usages of the medium. Where such stations already exist (e.g., WBOE Cleveland; WBGO and WNYE Newark-New York; KSLH St. Louis; WBEZ Chicago), they should be encouraged to devote at least some of their program output to the needs of the at-home audience and to operate at times other than purely in-school hours. Otherwise, the establishment of separate, share-time stations to cater to the nighttime, weekend and summer FM audiences should be permitted on these frequencies.

4. Miscellaneous groups: listener-sponsored radio, labor unions, junior colleges, trade schools, individual schools within a system, churches, libraries, museums -- for the second, third and fourth community assignments, on a first-come, first-served basis.

OPERATING SCHEDULES

Although not discussed in the FCC notice, the final proposal is a reiteration of one advocated by the writer in 1961 -- that educational FM stations be expected to adhere to the minimum operating schedules of commercial FM stations, particularly when that minimum is only 36 hours weekly, as it is at present. EFM stations could be exempted from operating during school vacation periods, but it would be reasonable to expect them to maintain a schedule during the summer sessions by the time of the expiration of the first license period. This would serve to make the educational radio service a reliable one from the standpoint of hours of program output and constancy of signal to the public.

SUMMARY

1. This paper provides general support for the recent FCC proposal to create a table of allocations for the educational portion of the FM broadcast band. It also concurs with the proposal to adhere to the same system of Class A and Class B/C channel designations, and the implementation of commercial FM mileage separations for educational stations in Zones I, IA and II.

2. Agreement is expressed for the eventual phasing out of the 10-watt FM stations, except for their use as satellites to extend the coverage of regularly-licensed operations.

3. Commercial TV charges of FM interference may stem more from economic than engineering reasons.

4. Priorities in the assignment (and subsequent granting) of channels are suggested.

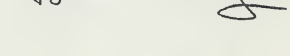
5. Minimum hours of operation should be specified, particularly for those educational FM stations in their second license period and beyond.

- - - - - - - - - - - - - - -

Stated above have been several proposals which, it is hoped, may provide an approach by which the educational FM broadcast service can develop into the vital national resource that should be its destiny.

Respectfully submitted,

Bruce F. Elving



OHIO

WOUB AM – 1340 KC
FM – 91.5 MC

RADIO BROADCAST SERVICES
OHIO UNIVERSITY
ATHENS, OHIO

December 29, 1966

Mr. Ben F. Waple
Secretary
Federal Communications Commission
Washington, D.C. 20554

Dear Mr. Waple:

I would like to react to your Notice of Inquiry, Docket No. 14185, regarding the revision of FM broadcast rules as they relate to the allocation of frequency and technical standards of educational FM stations. As you have undoubtedly anticipated, this docket has created considerable serious discussion on the part of educational FM broadcasters. I might make it clear that we are not particularly influenced by this Notice of Inquiry since Ohio University has applied for and indeed did receive this morning a construction permit to substantially increase the power and scope of its FM operation. My reaction is more out of a consideration for those educational stations who may want to continue utilizing the educational band of frequencies at 10 watts of power.

The intent of the Inquiry, as I see it, is to try to upgrade or to eliminate those 10 watt facilities which do not serve much of an educational purpose. We all know there are a number of these. However, there are many 10 watt stations--primarily associated with school systems--which are contributing to the educational process and who are accomplishing the purpose for which the 10 watt FM station was originally intended. I would not want to see the position of these stations jeopardized. For them to increase their power might not help them since it might impose financial as well as programming burdens on them which they could not conceivably handle. What is to be gained if they are already achieving their goals. It seems to me that in order to protect these stations the criteria for judging whether a station is fulfilling its purpose should be based on its performance or program schedule rather than on its power. If you find in your review of a station's composite week at license renewal time, that this station, in your estimation, is not fulfilling the purpose for which it was intended and is indeed a "parrating" of a commercial operation then that station should be asked to change its programming or turn in its license.

I think it is advisable to encourage those FM stations which can foresee within the province of their responsibility serving a larger regional audience to apply for an increase in their power. There are some larger operations--most of whom already have considerable FM power--who can justify

this kind of service, but the school system stations (generally a 10 watt FM) cannot justify going beyond their boundaries of their small university or secondary school system.

We would like to urge the Commission seriously to rethink their approach to the solution of the 10 watt problem. Specific recommendations (rather than a waiver of the rules) should be made to protect those 10 watt FM stations who are fulfilling their obligations to their license and to institute specific procedures to eliminate those who are not.

Sincerely,

Archie M. Greer
Director of Radio

AG:jo

OHIO

December 6, 1966

Mr. Ben F. Waple
Secretary,
Federal Communications Commission
Washington, D. C. 20554

Dear Mr. Waple:

Replying to the FCC Notice of Inquiry, B, FCC66-1007,90260, Docket No. 14185, concerning Revision of FM Broadcast Rules, particularly as to Allocation and Technical Standards (Educational FM Channels), Station WGUC, property of the University of Cincinnati, makes the following recommendation with special reference to Section 4:

> That Class B channels be permitted higher than 500-feet antenna height, with corresponding power reduction, so that the net result would be equivalent to 50 KW E.R.P. at 500 feet.
>
> That 50 KW at 500 feet should be a maximum with less than this amount permitted, but no less than twice the Class A figure of 3 KW E.R.P. at 300 feet.

In accordance with the Commission's rules, 14 copies of this comment are enclosed herewith.

Sincerely,

Joseph W. Sagmaster
Director of Broadcasting
University of Cincinnati

JWS:mi

cc: Jerrold Sandler, Executive Director
National Educational Radio
1346 Connecticut Ave., N.W.
Washington, D.C. 20036

OREGON

OREGON STATE SYSTEM OF HIGHER EDUCATION
DIVISION OF CONTINUING EDUCATION
EDUCATIONAL MEDIA

RADIO PROGRAMMING
~~Communications~~ 212 COLISEUM
CORVALLIS, OREGON 97331

December 27, 1966

AIR MAIL

Federal Communications Commission
Washington, D. C. 20554

Subject: Docket No. 14185

Gentlemen:

This reply is being submitted by the Department of Educational Media of the Division of Continuing Education of the Oregon State System of Higher Education.

We generally support the constructive proceeding of the Commission as set forth in the document entitled "Revision of FM Broadcast Rules, Particularly as to Allocation and Technical Standards (Educational FM Channels)".

In the matter of the request for comments regarding needs for state wide networks and communities in which we may seek assignments, we are currently in the planning stage of a state wide educational FM radio network in Oregon. It is anticipated that application of the Commission's proposed Population of Community-Number of Assignments table will be satisfactory for this purpose.

This opinion does not include the opinions of individual institutions in the Oregon State System of Higher Education which now may be operating ten watt FM educational stations.

Respectfully yours,

K. L. Warren
Radio Program Manager
Oregon Educational Broadcasting

KLW:fcr

bcc: Luke Lamb
Grant Feikert
Jerry Sandler, NER

Penn.

PENNSYLVANIA STATE ADVISORY COMMITTEE

ON EDUCATIONAL BROADCASTING

Sub-Committee on Radio Development

Ammended Preliminary Report February 2, 1965

* *

In the initial planning of a state-wide educational radio network, an important consideration is the intended over-all purpose of the complex. Your sub-committee suggests these points:

(1) To teach (in-school listening, both direct teaching and motivating programs) at all levels, correlated to specific course subject matter;

(2) Special education (continuing education for adults, make-up courses for drop outs, retraining programs in specific fields;

(3) In-service continuing training for elementary and secondary school teachers; exploring new techniques, innovations in various areas of education, and as a means of almost instantaneous contact with teachers by supervisors and administrators.

(4) Cultural and informational programs at various appreciation levels, intelligently presented at various hours to a pre-determined available audience.

It is the concensus of your committee that there two principle phases to the ultimate success of the project.

The first, and probably the most demanding phase, is the re-awakening of an awareness of the realistic potential of radio as an educational, cultural and informational medium. In the light of the intense promotion and utilization of television throughout the state, the potential of radio has suffered considerably in the mind of the listener. Another reason for this situation is that the rising generation was never exposed to the "golden age of radio." Its only experience with television-minus-pictures is as a purveyor of rock n' roll and country music.

The second phase in the development of radio in the Commonwealth is the designing and implementation of a practical, economical and efficient means of state-wide coverage.

Thus, stage one should consist of a border-to-border educational campaign among radio listeners and possible listeners, using all the techniques of persuasion, exposition, demonstration, and whatever else is required - to convince potential listeners that radio - true radio - has not become obsolete, nor has it lost any of its impact.

It should be pointed out that the great majority of present-day teachers and administrators are unfamiliar with the potential of radio as a teaching medium, or are enamoured of what they are ready to believe is the panecea of instruction by television. Others may feel that any departure from the formula of teacher-pupil confrontation in the flesh is prostitution of their calling. Such conditions demand as much attention be paid to educating educators to the potential of radio, as is being directed toward the layman.

Among the many methods which may be employed effectively, on of the most persuasive is making available radio as it can be, produced and presented by various radio-oriented groups from educational organizations. It is suggested that increased effort be expended on the part of educational groups - in the absence of a local educational radio station - to step up activity to interest the local radio outlet to provide some time for educational and cultural programs (within a logical listening time segment), and also to stimulate the station personnel to assist in the conception, preparation and presentation of such programs. Your subcommittee cooperation is standard operational procedure, and is to be highly commended.

This cooperation notwithstanding, it is a hard economic fact that these stations are in business to show a profit, however altruistic and cooperative their managements would prefer to be. As an unfortunate result, educational - or non-commercial - programs MUST be relegated to time segments not presently sponsored. These segments vary with the station and the region. Even when prime time is made available to educational organizations there is no assurance it will not be pre-empted by a commercial program. And this is as it should be. It's not reasonable to expect a broadcasting station, existing for one purpose to underwrite a diametrically opposed type of broadcasting with an entirely different objective. Cooperation should be appreciated but not demanded.

It should be pointed out further that reliance on commercial radio broadcasting stations be continued only so long as educational organizations in the area are without a non-commercial outlet, even though such an outlet be of low power.

In the area which some Olympian academicians refer to as the "nuts and bolts" aspect of radio programming for state-wide consumption, there are some tried-and-true practices to guide the network planners. Since sequential connection of network stations is not feasible at the outset, and because of the necessity to effect a sympathetic atmosphere if the idea is to flourish, it is suggested that programs on tape - both direct teaching and motivational - be obtained from approved sources and made available to schools indicating their interest in and desire for such programs, these to be offered to presently cooperating commercial stations, or available non-commercial outlets.

Several universities in the state and some out-of-state sources presently engaged in radio broadcasting,- or at least operating as production centers - have programs on tape which they would be happy to make available for state-wide distribution and use either by or under the auspices of interested school systems, colleges, or responsible educational groups. Some of these programs fit the category of direct teaching, others are motivational, non-formal educational, or cultural. Obviously, however, some thought must be directed toward the mechanics of distribution.

This would almost presuppose a centrally located depository and distribution center, adequately staffed, to handle the machinery of such an operation.

As educators and listeners become more aware of the important contributions to be made by radio, an intensive campaign is indicated, aimed at present operators of on-the-air educational stations to increase their power and facilities, at closed-circuit operators to step up to broadcasting operations. Even those institutions not presently operating broadcasting or closed-circuit radio, might be induced to participate in this project if it can be demonstrated that they will benefit from such participation. This campaign might well begin with the fourteen state liberal arts colleges as well as other institutions of higher learning throughout the Commonwealth.

The reasoning behind this suggested campaign is that presently,the National Association of Educational Broadcasters, through its National Educational Radio division, is moving forward to realize its long-standing dream of a national educational radio network spanning the length and breadth of the country. Pennsylvania is an important component in this monumental concept, and should direct its own planning toward this ultimate objective, and be ready to assume its proper role in the national picture at the earliest possible moment.

Education, if it is to take advantage of the effective means of mass communication, must be prepared to foot its own bills through community support, State assistance, or a combination of these plus available educational grants from national or industrial foundations.

In approaching stage two, which is to effect a state-wide network of radio stations, it must be possible to transmit signals from one station which can be received by a second station, and in turn, transmitted to a third station, and so on, until the signal has been distributed and received in every area of the state.

This may be accomplished in one of three ways:

1. Land line connections
2. Microwave connections
3. System of high power transmitting stations.

The land line system has some advantages but will prove quite costly on an annual lease basis or outright purchase and maintenance.

Microwave installations, in the number required to cover the state (with low power stations) also would prove costly both in original cost and maintenance categories.

The third system, although presenting an original cost of some proportions, eliminates connecting expense, and provides complete coverage of practically every area of the state.

Two important factors are inherent in this latter system. The strategically located stations are conceived as having an effective radiated power output of 50-kilowatts, transmitting from a height to overcome existing terrain obstacles. A sufficient number of stations would be able to pick up the signal from its nearest neighbor.

The second feature of this system is that each station would be equipped for multiplexing signals. Multiplexing, or the ability to broadcast simultaneously three (or more) radio programs from a single transmitter, is a unique feature of FM. In simplest terms, this refers to a main channel (available) to any FM receiving set), and two (or more) sub-channels, available only to special receivers capable of decoding the sub-channel signals. The main channel would be employed to care for its own coverage area; one side band would be employed to carry network programs; the other side band could be employed for feeding the network, serving a regional network, closed-circuit communication such as a "conference call," for in-school listening with its local coverage area. Using the main channel and one of the sub-channels, listeners could enjoy true "stereo" broadcasts.

Other uses of these sub-channels (without interfering with the primary signal) include many non-broadcast oriented services. One such use is the exchange of important information from computor, library or research centers (as projected in national plans evolved by NAEB), re-training programs, intra-area professional "roundtables." As explained previously, any utilization of these sub-channels would require receiving sets capable of decording the sub-channel signals.

Obviously, the first task is to determine - based on sound engineering tests - the placing of these strategically located high power stations... it is scarcely possible that communities would welcome a second demand for contributions to underwrite establishment of these stations - since they are being or will be asked to support existing or planned television stations. Therefore, it is suggested that these stations be located - where feasible - at institutions of higher learning. These conceivably would be in a better position to provide a staff of more advanced maturity than could reasonably be expected from a school system. These institutions would also make good use of the high power stations for projecting their own image into their coverage area.

However, it might be well to underline the "in-school" listening factor of multiplexing. Though the broadcasting stations would be outside the physical control of individual school systems, all programs designed for use by pupils (whether during class periods or after-school listening) would be subject to final selection by the schools.

Any idea that all such stations be activated simultaneously is less than realistic. It is suggested that the minimum number of stations required to provide a practical east-west link between the Eastern Educational Radio Network, and the Mid-west counterpart receive primary, though not necessarily exclusive, consideration.

This action would follow an inquiry into the FM frequencies in the educational portion of the spectrum available to the state. Considerable assistance should be expected from the Educational Broadcasting section of the FCC, and from H.E.W., as well as NER.

As a parting word of assurance to those who may be misled into feeling that educational radio has become passe since the advent of ETV, it should be noted that, despite increasing interest in and use of ETV, educational FM RADIO stations have been going on the air at the rate of 25 to 30 every year since 1960.

The development of radio in the Commonwealth to a point where it is an effective distributor of educational and cultural programs with what amounts to "blanket" coverage, is a task of no mean proportions. However, it is not impossible. It will require careful planning and execution of each progressive phase with a minimum of waste time and effort. Delay in either area would spell permanent public and official indifference to the concept of a Pennsylvania Educational Radio Network.

Respectfully submitted,

B. Kendall Crane

B. Kendall Crane
Director,
Radio Station WDUQ
Duquesne University

Penn.

COMMENTS FOR FCC NOTICE OF INQUIRY

The Executive Committee of Duquesne University of Pittsburgh, Pennsylvania, licensee for Radio Broadcating Station WDUQ, 91.5 mc/s, Channel 218, with transmitter rated at 1 kw, and an ERP of 2.75 kw, concurs in the suggestion contained in the matter of "Revision of FM Broadcast Rules, Particularly as to Allocation and Technical Standards (Educational FM Channels", Docket No.14185, Federal Communications Commission.

Although Channels 201 through 220 (88.1 through 91.9 mc/s) have been reserved/for educational broadcasting use, there has been, unfortunately, a tendency at some educational institutions which seemingly fail to develop the awareness of the pedagogic and cultural potential of this instrument of "mass" communication, to treat the acquisition of a broadcasting license with less than the sense of profound responsibility such an instrument implies.

Instead of being content with a multiplicity of lowepower, sometimes ineffectual operations, use of multiplexing and realistic power should stimulate multiple educational institutions in an area to cooperate in maintaining a single installation at some easily accessable location. Thus, the sub-channels could be utilized for direct instruction, where desired, while the main channel remains free for programs beamed to the local community.

School systems, public or private, which have made a practice of utilizing a radio frequency for direct teaching exclusively and only during school hours, should be required in the public interest, to provide informative, cultural and infortation broadcasting for general audiences during the evening hours.

In the matter of many broadcasting stations operating on assigned frequencies at power of 10 watts or less, it has long been a considered opinion that this is less than completely productive utilization of a valuable instrument, and does not fulfill the intent inherent in the license, itself. Essentially the same results (for all practical purposes) can be enjoyed with closed-circuit operation, requiring no assigned frequency. Thus, a channel would be available for possible utilization with greater signal power by an organization prepared to serve a greater potential audience.

Too frequently these extremely low-power stations are "student stations" or "campus stations", operated entirely by students, with only nominal faculty or professional supervision and direction. The programs too often are produced for the student listener only, and in a majority of cases, although there are exceptions, provide a service which could in the main be duplicated by an available commercial station.

The requirement of minimum stated power for any station using a federally authorized frequency will tend to foster greater responsibility in station management which in turn will more realistically project the image of the licensee into the community. We urge that each federally licensed station presently operating below the power minimum (to be determined) for stations in its class, be given the opportunity to comply with the requirements within a reasonable time, without fear of penalty or loss of license, and that revocation of license be invoked only upon refusal by the licensee to comply with the minimum requirements for stations in his class within a reasonable time, or if the licensee remain silent beyond the reasonable time for a reply.

The manager of WDUQ, as chairman of the sub-committee on radio, of the Pennsylvania State Advisory Committee on Ed. Bdcstg., has submitted to the Department of Public Instruction of the Commonwealth of Pennsylvania a proposed plan for a statewide network complex which could be operational without land-line or micro-wave linkage.* Seven strategically located high power (50 kw) broadcasting stations, using maximum height towers, multiplexing and powerful professional receivers could cover the majority of population centers by picking up and passing on programs "off the air". (See Appendix A for map). These "key" stations would be supplemented by lower power stations between the larger coverage circles, thus offering programs simultaneously to approximately 90 percent of the Commonwealth's population. One of the sub-channels of the "key" station would feed the network programs and broadcast locally at the option of the local station. The high power stations would also serve as the basic state link for any future national educational radio network.

While it is understandable that concern for the intelligent development of eventual state-wide and/or regional radio networks be directed at state bodies, it should be pointed out that there are presently radio installations at private institutions which maintain a strong "community" complexion in their offerings to general audiences in the community. It is to be hoped that the needs of these operations be weighed on equal terms in the light of their contributions to the enrichment of their audiences as their tax-supported colleagues, and not on the basis of their possible affiliation.

---

* This plan has not been substantiated by more than a cursory engineering survey, and does not represent the result of a complete engineering study.

Pennsylvania, because of its topography, offers many challenges to conventional coverage projection formulae. Without the use of translators in some of the more rugged areas, it may be a problem approaching the impossible to put down a signal into every community. The alternative is an increased number of Class A stations. And even in this event it is conceivable that some translators might be required.

WDUQ during its broadcast life of more than 16 years has realized and demonstrated its responsibility to the community. It has sought to provide programs, features and services not normally made available by the commercial radio stations of the area. Its facilities have been open to other educational groups of the district, including the other institutions of higher learning.

The station is an active member of the National Association of Educational Broadcasters and was a charter subscriber to the National Educational Radio (Tape) Network, thus assuring excellent programs in a variety of interest areas from widely separated sources.

It has been the on-going policy of WDUQ to broadcast either "live" or by delayed tape recording community events , and comments of interest to various segments of the audiences.

No discrimination of any kind or degree is or has been practiced by the station, thus deserving its boast of being a "community" radio broadcasting station, in the truest sense of the word.

Commenting on footnote #1, page 2, referring to the stations with facilities larger than the equivalent of a Class A station, we feel that if thd type f service to their audiences warrants it, each should be made a case for special inquiry, and that protection commensurate with their present and past history of service be used as a basis for decision.

As to footnote #2, it would seem reasonable that once state-wide coverage in larger population centers is assured, provision might be made for a greater number of Class A stations within the 100-watt to 3 kw range, contingent upon their ability and willingness to provide suitable services to their individual communities. Because of their comparatively limited coverage area channels for these stations might well be contained in a block of frequencies without working hardship or causing interference.

Paragraph 6,page 3 speaks of 10-watt operatixns which for valid reasons are permitted to remain in operation. These could be shifted to the lower educational channels without prejudice, meanwhile maintaining existing co-channel and adjacent-channel mileage separation requirements.

We concur in the attitude expressed in paragraph 8,page 4, that FM educational assignments be made irrespective of possible interference with television translators, since translators do not represent primary signal emission sources.

We can see no practical need to change the limitations on facilities and separation in the educational radio band, from those of the commercial frequencies.

—

B. Kendall Bronn

Pennsylvania

ALBRIGHT COLLEGE

READING, PENNSYLVANIA 19604

THE INTERCOLLEGIATE BROADCASTING SYSTEM

WXAC 91.3FM

PHONE : 374 - 3274
(area code 215)

December 22, 1966

Committee on Educational Radio
Federal Communications Commission
Washington, D.C.

Dear Sirs:

As manager of a 10w educational outlet I would like to offer my opinions to the committee concerning the matters of an allocation of FM channels and elimination of 10w stations.

It is my opinion that if properly organized, a network of educational stations could be established. The greatest problems would be the actual organization of such a network and financing such a project. Attempts at linkup of college stations has been tried several times by the Intercollegiate Broadcasting System in our area, however, these seemed to have failed because direction was not strong enough and member stations did not have the financial backing to attempt such a venture. Because educational FM is noncommercial, many stations, especially on the college level, must go to the school for finances, a system which allows very little excess money for such ventures. If a sponsor and a leader could be found, it is our opinion that such a network could be organized.

It is our opinion that the 10w outlet should be eliminated from the educational band. As manager of such a station, we realize its limited power and inability to adaquately cover our listening audience with even a minimum strength signal. We feel that if an organization or college is willing to make the necessary investment to begin a radio station, that the small additional amount of money necessary to raise power should be allocated also.

We also feel that the 10w outlet should be permitted to the licensee during the first period. Because many of these educational stations are organized by colleges with no experienced personnel, we feel that a 10w outlet would be advantageous to these groups until enough personnel have gained experience so as to present a more sophisticated sound. At the end of the first period, the licensee would then have the option to increase power to the minimum established by the commission or forfeit their license. We suggest that 250w be made the base after the first period.

It is also our opinion that a stricter procedure be adopted by the commission when granting renewal of license to educational stations. It is our opinion that too many of these stations fail to achieve their goal as an educational station, becoming merely playthings for the personnel involved offering contemporary and popular music for the entertainment of their audiences. We feel that such a use of an educational channel is a waste of license and space on the dial.

We hardily commend the Commission to review its policy on educational stations and to adopt a more stringent policy when renewing licenses. We ask the Commission to examine the programming of these noncommercial stations when renewal of license comes due and to issue renewal based not on a strict outline of percentage of type of programs offered, but on the basis of whether the station under scrutiny is fullfilling its obligations as an educational outlet to its audience.

We appreciate the interest of the Commission in the educational radio field. We hope that we will be able to further aid the Commission if possible.

Sincerely yours,

Edward R. Sobel

Edward R. Sobel
Station Manager

ERS/rs

CC:NAEB-Natl. Edu. Radio
:Intercoll. Broad. System

Tennessee
BEVERLY BRILEY, MAYOR

Metropolitan Government of Nashville and Davidson County

DAVID MARSHALL STEWART
CHIEF LIBRARIAN

THE PUBLIC LIBRARY OF NASHVILLE
AND DAVIDSON COUNTY
EIGHTH AVENUE, NORTH AND UNION
NASHVILLE, TENNESSEE 37203

December 19, 1966

RECEIVED
DEC 22 1966
NAT'L EDUCATIONAL RADIO

Mr. Jerrold Sandler
Executive Director
National Educational Radio
1346 Connecticut Avenue N. W.
Washington D. C. 20036

Dear Jerrold:

Enclosed you will find three copies of the comments we filed in response to the FCC's Notice of Inquiry of November 14, 1966.

Yours truly,

Alvin L. Bolt, Supervising
Audio-Visual Librarian and
Mgr. of Radio Station WPLN

ALB:rf

In the Matter of	)	
	)	
Revision of FM Broadcast Rules, Particularly as to Allocation and Technical Standards (Educational FM Channels)	)	Re: Docket No. 14185

The Federal Communications Commission:

The Public Library of Nashville and Davidson County, Tennessee, licensee of WPLN, 90.3 mc, hereby submits the following comments in regard to the commission's Notice of Inquiry, dated November 14, 1966. The numbering herein corresponds with the numbering of the Commission's document.

1. Review of Proceeding. No comment.

2. Proposed FM Table of Assignments. (1) The library concurs in the belief that a nation-wide Table of Assignments for educational FM stations would best serve the educational radio needs of the country. (2) Further, the library supports the present policy of reserving the frequencies from 88.1 to 91.9 megacycles for educational broadcasting. (3) We propose that the first criterion in preparing assignments should be existing facilities now in use.

3. Single Signal Coverage. The principal aim of providing single signal coverage to as much of the population and area of the country as possible in so far as state-wide and regional networks are concerned is strongly supported. Assignments in this respect should be made so that every individual residing in these United States should have access to at least one source of educational broadcasting. With today's increasing tendency toward urbanization, single signal coverage would serve the needs of the more populated urban areas and residents in the less populated surrounding areas, and at the same time provide one means of interconnection for state-wide and regional service.

In preparing assignments meeting this aim, we equally strongly recommend that in no way should assignments be made that would hinder the growth of facilities of lesser signal coverage within the same area. In Tennessee the population tends to be concentrated around four metropolitan areas. Interconnection between these areas is a must, but there are many institutions in lesser populated areas of the state that do and could adequately support smaller broadcast operations. Assignments should be made to provide for the growth of such facilities. Smaller educational centers would thus provide many resources not otherwise available to the entire state.

No recommended table of assignments for Tennessee is available at this time. However, plans are already underway which will ultimately provide recommendations which will meet the needs of Tennessee. The next meeting will be in Nashville on January 17, 1967. The Commission will be advised of recommendations resulting from this meeting.

4. Classes of Stations and Limitations. We do not endorse the proposal to limit the power of educational stations. (1) Some areas in the South will be without service even though assignments will be made. Some areas are economically unable to support an operation even on a small scale. Therefore greater coverage from the metropolitan areas should be allowed in order to provide some service to these less developed communities. (2) In Tennessee a network would be greatly enhanced if (a) greater coverage were allowed for "off-the-air" interconnection and (b) sub-carrier authorization were made to provide a "feed-back" circuit between stations. Since effective area coverage is reduced by sub-carrier operation, greater power should be allowed to facilitate interconnection. In addition, due to the nature of FM transmission there are inherent limitations on the area covered no matter how much power is used. Therefore any arbitrary limitations would be superflous. To adequately serve rural communities while meeting network requirements, we propose that no operating power limitations be set for educational stations, except those that are presently in effect.

5. 10-Watt Stations. We support the proposals regarding 10-watt operations. We believe this would be an improvement in the use of this medium. However, we would urge the Commission to give every possible opportunity to all 10-watt licensees to meet the proposed standards. From experience, we realize that it takes time to mobilize a staff and equipment to operate at the levels indicated in the proposals. While we have been able to develop much more rapidly than we anticipated at the start of our program, we have had more fortuitous circumstances than most stations now in existence. For this reason we would demur with regard to the brevity of the period allowed licensees to meet the proposed standards. We suggest that a system be established whereby the licensee might demonstrate progress toward meeting these standards, thereby lengthening the apprenticeship period.

6. and 7. 10-Watt Channel Assignment and Interference to TV Channel 6. We would be amiable to the idea that 10-watt stations be restricted to channels 201 through 204 where development is a criterion and interference with channel 6 is not a problem.

8. Translators. We support the view of the Commission.

9, 10, 11, 12. No comment.

SUBMITTED BY: THE PUBLIC LIBRARY OF NASHVILLE AND DAVIDSON COUNTY

DATE: DECEMBER 16, 1966

SIGNATURE: _____

Jerry, for your info. Mailed 12/29/66 to FCC Tennessee

THE UNIVERSITY OF TENNESSEE
DIVISION OF UNIVERSITY EXTENSION
14 AYRES HALL
KNOXVILLE

RECEIVED
JAN 17 1967
NATL EDUCATIONAL RADIO

DEPARTMENT OF BROADCASTING SERVICES
RADIO STATION WUOT
U-T TELEVISION
STATE RADIO TAPE NETWORK
TENNESSEE HIGH SCHOOL SPEECH AND DRAMA LEAGUE
TENNESSEE ASSOCIATION OF BROADCASTERS STATE OFFICE

December 27, 1966

In the Matter of	)	
	)	
Revision of FM Broadcast Rules,	)	Re: Docket No. 14185
Particularly as to Allocation	)	
and Technical Standards	)	
(Educational FM Channels)	)	

The Federal Communications Commission:

The University of Tennessee, the state university and land-grant institution of the state of Tennessee, and licensee of WUOT-FM, 91.9 mc, hereby submits the following comment in regard to the docket stated. Comments will be made on those phases of the Commission Notice of Inquiry dated November 14, 1966 which are of concern to The University of Tennessee. The numbering of the comments coincides with the numbering of the various points of inquiry in the Commission document.

1. Review of Proceeding. No comment.

2. Proposed FM Table of Assignments. The University urges the Commission to adopt a nationwide Table of Assignments for educational FM stations, continuing the present policy of reserving such assignments for non-commercial use in the 88.1 through 91.9 mc band. The University further urges the Commission to protect all present assignments, power authorizations, and separation requirements of existing educational FM stations, permanently in the case of regular facilities, and as hereinafter stated under comment 5 for 10 watt facilities.

3. Single Signal Coverage. The University urges the Commission to pursue the principle of providing for single station coverage to as much of the population and area as possible. There are at present four educational FM stations in Tennessee, two under construction, and at least three more in advanced planning stages. Such involvement makes a state network a distinct possibility within the next few years. The creation of such a network would be greatly facilitated by providing for at least ten Class C stations in Tennessee. There are at present three Class C stations on the air, and seven more would be needed.

But the University is equally convinced that additional assignments in the Class A category will be needed if statewide participation is to be achieved in Tennessee. Certainly single

station coverage over a wide area is essential, but in certain areas of the state the local educational and political climate is such that financial and personnel resources can only be utilized fully if smaller local stations are members of the state network in addition to the higher powered stations. Such secondary stations may well be limited to 3 kw as provided for Class A stations; in fact, smaller school systems and institutions of higher learning would in some cases prefer to operate smaller stations with resultant savings in capital outlay and operating costs if such stations can still be part of a state network. The problem is simply that even if Class C stations would cover the entire state without local Class A stations, such a network would not provide means for utilizing the many resources of smaller but important educational centers, and a large-station only network would be far less successful in getting full statewide financial support.

The following table is included only as a guide, and has no official approval or even tentative agreement among the other educational FM stations. It is offered to illustrate the problem of ten Class C stations being supplemented in several parts of the state by eight lower-powered stations.

Memphis	)	these areas would need Class C
Nashville	)	facilities, one station with
Knoxville	)	sub-channel capabilities for
Chattanooga (area)	)	networking purposes. But in
Tri-cities of Johnson City,	)	addition, several of the areas
Bristol, Kingsport	)	would need additional channels
Monteagle	)	for local needs only.
Cookeville	)	
Martin	)	
Jackson	)	
Lebanon	)	
Athens	)	These areas have large state or
Clarksville	)	private colleges, branches of
Columbia	)	other institutions, or some
Crossville	)	special reason for requiring
Greeneville	)	local facilities. Class A stations
Henderson	)	would be acceptable, perhaps, but
Oak Ridge	)	interested groups in the areas
Murfreesboro	)	may file additional comment.

A precise engineering statement of the locations of various stations cannot be made within the time allotted by the Commission for comment, but plans are now underway and have been for some time to proceed with network planning which will include engineering studies.

The next planning meeting for state networking of FM stations will be in mid-January, 1967, beyond the date of filing comment or replies, but the Commission will be informed as plans develop.

Finally, the University endorses the Commission proposal that additional channels be allocated to communities beyond the channels needed for networking, and endorses the proposed assignments listed on page 2 of the Notice of Inquiry.

4. Classes of Stations and Limitations. The University endorses in general the Commission intention to apply the same standards to educational FM in the matters of class, power, antenna heights, and separations as now apply to commercial FM. But it is important that present educational FM stations on Channels 201, 204, 206, 208, and 216 be permitted to continue using facilities greater than those for new Class A stations, which matter would appear to be clearly the Commission's intention.

5. 10 Watt Stations. While the matter of 10 watt stations is of no proprietary interest to the University, a regard for the entire state of educational radio requires that the University endorse the Commission view that restriction of 10 watt licenses will be necessary as educational radio stations increase.

The University demurs, however, on the proposal under Paragraph 5(1), admitting no further authorization of 10 watt stations. Even with the provision that waiver might be made of this rule, such a rule would surely deter smaller institutions from entering the educational radio field. It is clearly the experience in Tennessee that modest facilities enable an institution to build staff and faculty support to the point where quite large facilities may be acquired in three to five years. It is unlikely in some cases that larger facilities would be acquired at the outset without prior experience and acceptance of radio usage in education.

The University endorses the Commission alternative proposal under Paragraph 5 (2), allowing existing 10 watt stations to continue to operate on this basis for a time. It is necessary that the University demur, however, on allowing such continuation only through the existing license period. It is possible that rule making procedures would be completed within a year or less of the end of a station's license period, and such a short period of time to change to higher power would prove a hardship to most 10 watt stations. It is proposed, therefore, that 10 watt stations be permitted to operate on that basis for the remainder of the license period, plus one additional license period before going to higher power.

The University also endorses in general the proposal under Paragraph 5 (3) to delete one or more 10 watt assignments for regular assignments elsewhere, and to require the 10 watt licensee to indicate that an application will be made for higher power. But again the time limit on such application should not just be to the end of the present license period, but through the present period plus one more.

6. and 7. Channel Six Problems. Although Knoxville, Tennessee, the home city of the University of Tennessee, has a television station on Channel Six, there is no problem because WUOT-FM is on Channel 220. No further comment.

SUBMITTED BY: THE UNIVERSITY OF TENNESSEE

DATE: DECEMBER 27, 1966

SIGNATURE: Kenneth D. Wright

Kenneth D. Wright
Director

The University of Texas at El Paso
TEXAS WESTERN COLLEGE
Department of Mass Communication

Dec. 12, 1966

Mr. Jerrold Sandler
National Educational Radio
1346 Connecticut Ave. N.W.
Washington, D. C. 20036

Dear Mr. Sandler:

We have mailed the required fourteen copies of the enclosed comment on the proposed 10 watt FM regulation.

I have no idea what stand the N.E.R. is taking on this matter, but it surely would be in our best interest if things remained as they are.

Sincerely,

Virgil C. Hicks
Head (Broadcasting)
Dept. of Mass Communication

VCH:slm
Enclosure

TEXAS

The University of Texas at El Paso

Texas Western College

Department of
Mass Communication

December 12, 1966

In the matter of

Revision of FM Broadcast Rules, Particularly as to Allocation and Technical Standards (Educational FM Channels)	Docket No. 14185 File B--FCC 66-1007 90260

COMMENTS OF TEXAS WESTERN COLLEGE OF

THE UNIVERSITY OF TEXAS, EL PASO, TEXAS,

LICENSEE OF KVOF-FM

KVOF-FM was licensed as a 10 watt educational FM station in 1954 and has operated continuously since that time with the exception of summer vacation intervals.

The supervisory personnel of this station are strongly opposed to the proposals set forth in the NOTICE OF INQUIRY which is the subject of these comments. Throughout its twelve years of broadcasting, KVOF-FM has provided an in-school program service to the El Paso Public School System between the hours of 9a.m. and 3:15p.m., Monday through Friday. The hours from 3:15 through 10p.m. sign off have been used to provide realistic training in station operation for the Broadcasting majors of this institution. The program service supplied by KVOF-FM is unique in this area and does not duplicate the programming of commercial FM stations. The college operates a carrier current system independent of the FM station.

We object to the proposed rule making for the following reasons:

1) Higher transmitter power will put us more directly into competition with local FM broadcasters and might very well impair the excellent relations existing between college and commercial broadcasters.

2) We have no assurance that financing will be available to meet the qualifications of a Class A station and the twelve year history of broadcasting at this institution might have to be terminated.

3) We do not believe that there would be any appreciable increase in our present coverage area by the addition of power alone; it would probably be necessary to move the transmitter and antenna to the top of Mount Franklin which would involve prohibitive costs.

We strongly urge the continuance of the present 10 watt educational FM station with perhaps more restrictive regulations on programming.

Sincerely yours,

Virgil C. Hicks

Virgil C. Hicks
Head (Broadcasting)
Dept. of Mass Communication

VCH:slm

VERMONT

February 20, 1967

Mr. Ben F. Waple, Secretary
Federal Communications Commission
Washington, D. C. 20554

Dear Mr. Waple:

This is in reference to "Notice of Inquiry," Docket No. 14185.

After careful consideration and deliberation by all interested and concerned individuals at the University of Vermont, we wish to make the following comments regarding 10-watt FM non-commercial educational broadcasting.

1. The University of Vermont is in accord with the intent of the proposal of the Federal Communication Commission to obtain more efficient use of the FM spectrum. While we realize that more efficient use of the FM spectrum could be made, in some instances, by deletion of 10-watt FM stations, there are undoubtedly some geographical areas where spectrum needs would not require deletion of stations with this power. We would favor a station by-station analysis, rather than a deletion of all stations of this type. It is our feeling that when present operations do not interfere with proper utilization and growth of the FM spectrum, that these stations should be allowed to continue to broadcast inasmuch as such stations provide a legitimate service at a minimum cost.

2. While we have no definite plans at this time, it is our hope that at some appropriate time in the future a statewide educational FM network for Vermont may become a reality. FM is relatively undeveloped in Vermont, at present, with only one commercial and one educational station in the state. There is obviously a need for a statewide FM educational network. We would hope that sufficient FM channels would be allocated to Vermont to make such a network possible.

3. In the event that the Federal Communications Commission abolishes 10-watt FM stations and requires a higher minimum

3. power, the University of Vermont would hope to find funds that would enable it to make the modifications required for continued operation.

Sincerely yours,

William J. Lewis
Station Manager, WRUV-FM

WJL/ms
cc: L. S. Rowell
R. V. Phillips
N. T. London
L. E. Van Benthuysen
H. O. Skinner
W. K. Edwards
R. G. Dilley
M. R. Bensman
H. T. McKinney
E. Czarra

December 20, 1966

Federal Communications Commission
Washington, D. C.

Gentlemen:

As the director of a 10 watt educational FM station, I would like to state our position on the proposed change to class A station as presented in Docket No, 14185.

The increase in power dictated by this change would present such hardships to the small stations as to put many of them out of business.

One of the major considerations of a school district is finance. The initial change over, as well as continued maintenance would force a large increase in station budgets. Some of the figures of this expense are listed below, some have been approximated but are accurate representations.

Frequency monitor	(Gates)	$1000.
Modulation monitor	(Gates)	600.
Power output meter		250.
250 watt transmitter	(Gates)	4000.

the additional salary of an engineer to make daily transmitter checks

Aside from the fact that many school districts cannot or will not meet this expense, the added power usually will do nothing to add to the station's purpose, nor would a plan to convert to a carrier current operation.

To be specific, WOAK's original application stated its objectives as:

1. To train students in the broad field of broadcasting.
2. To assist teachers by broadcasting programs on all levels for in-school listening.
3. To act as a bridge between the schools and the community.
4. To render community service by supplying serious educational and cultural programs.

The fact that students are actually "on the air" gives the needed impetus to stive for quality programs. Yet added power does not change this condition curcuit basis this attitude would necessarily change. However, it is impossible to link the buildings within the school system, using public utility lines.

Also, added power would increase station coverage; but since its primary goal is to serve the community going outside of the city limits is not really necessary. Many small communities have no need to go beyond their average ten mile radius. We service the community of Royal Oak by broadcasting the City Commission Meetings and a weekly sports event from the high schools.

If the forces of the power increase forces the 10 watt station out of existance, they would no longer be able to act as both an important part of the community and school district while educating students in the techniques and evaluation of broadcasting.

It is our expressed wish that the commission find some way to solve the problem of an overcrowded spectrum other than to force this action on the 10 watt educational stations. Many stations are presently using their facilities quite fully with regard to their own specific needs. We are enclosing our program schedule as an example of how this station uses its time.

Thank you.

Sincerely,

Sheila Shook

(Mrs.) Sheila Shook
Station Manager
WOAK FM

SS/sjm

cc: National Association Educational Broadcasters
Intercollegiate Broadcasting System

Scanned from the National Association of Educational Broadcasters Records
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